

# Appendix 2b

## Responses by Consultation point

### 6-The Settlement Hierarchy

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### 7-The Housing Strategy

Pages 211 to 1002

### 8-The Employment Strategy

Pages 1003 to 1199

### 9-The Retail and Leisure Development Strategy

Pages 1200 to 1337

### 10-Delivering Infrastructure to support Growth

Pages 1338 to 1667

### 11-Neighbourhood Planning

Pages 1668 to 1748

### 12-Monitoring Review

Pages 1749 to 1820

## 6 - The Settlement Hierarchy responses

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS24
<b>Person ID</b>	1253669
<b>Full Name</b>	Amy Harman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS41
<b>Person ID</b>	1253620
<b>Full Name</b>	John Howard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	The statement <i><u>"In order to ensure that new development takes place in locations that have the best access to a wide range of services, facilities and employment opportunities, whilst minimising the need to travel, we have developed the settlement hierarchy"</u></i> seems to imply that all the residents of the new proposed housing developments will be eager to use the local bus services, also does it imply that a majority of the new unaffordable houses will be for high earning commuters. This plan will not, as I see it, benefit the indigenous population of Dacorum.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS75
<b>Person ID</b>	224191
<b>Full Name</b>	mr david gardiner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	settlement heirachy make no reference to Tring Station. Tring Station should be included within the Small Villages section or at least clarified that it is not included within Tring.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS88
<b>Person ID</b>	1255447
<b>Full Name</b>	Andrew Sparrow
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	Berkhamsted is a small and desirable market town. Please operate the planning process with care, so as not to harm its distinct local character. If there must be "significant development" I would prefer that it be in several smaller pockets around the town than large single developments.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS104
<b>Person ID</b>	1254846
<b>Full Name</b>	James Martin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	Northchurch is not mentioned in the hierarchy, yet contains a disproportionate amount of the development. Northchurch is a separate and historic village of its own and should be covered as such in the emerging plan.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS123
<b>Person ID</b>	1145831
<b>Full Name</b>	Mr Nicholas Jones
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	The topography and transport infrastructure of Berkhamsted is not suitable for significant housing development. Berkhamsted only has one access point to the A41 which leads to significant traffic congestion particularly at peak time. Its railway station in the town centre is difficult to access by either public or private transport.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS137
<b>Person ID</b>	1142526
<b>Full Name</b>	Mrs Angela Goddard
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	Why do you think that it is ok to enlarge historic market towns to such an extent that the pleasure of living here is negated by the lack of ability to move around or enjoy any country environment within walking distance from their homes?
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS171
<b>Person ID</b>	1257604
<b>Full Name</b>	Richard Hillier
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	Berkhamsted is an important historical town. You should not seek to overwhelm it and destroy it's heritage by over developing the place. Removing the football club (as part of the Bulborne Cross development) for example is an absolute travesty which WILL see the death of the club.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS193
<b>Person ID</b>	1257823
<b>Full Name</b>	Thomas Ritchie
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	As was overwhelmingly supported in the 2017 consultation, the majority of growth should be in Hemel Hempstead where the infrastructure and employment opportunities are available and easily grown. The planned huge growth in Berkhamsted and Tring are wrong, cannot work with insufficient infrastructure and would destroy the character of these ancient towns. The new town option is the only one acceptable.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS224
<b>Person ID</b>	868491
<b>Full Name</b>	Mr Graham Hoad
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	SP3 For Tring to act as a service centre there will need to be a solution to the car parking issues. Tring streets have become crowded car parks with all the dangers of increasing accidents. Space needs to be found for visitors to the town and anti-social, non-compliant parking discouraged. HCC assistance would be welcomed in this respect.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS249
<b>Person ID</b>	1207707
<b>Full Name</b>	Mike Beavington
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS271
<b>Person ID</b>	1258885
<b>Full Name</b>	hattie mackinder
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Tring is already over subscribed for schools. Any further developments would be overcrowded
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS304
<b>Person ID</b>	1258240
<b>Full Name</b>	Adele Giles
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I agree that Hemel Hempstead is the most sustainable location in the Borough. Berkhamsted and Tring are only sustainable to a point. Proposing to increase the population of these towns by approximately half in the former's case and at least three quarters in the latter case seems to me to amount to over and unsustainable development.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS321
<b>Person ID</b>	1259852
<b>Full Name</b>	Imogen Wagstaff
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS352
<b>Person ID</b>	1259924
<b>Full Name</b>	Bassil Aslam
<b>Organisation Details</b>	
<b>Agent ID</b>	1259009
<b>Agent Full Name</b>	Bassil Aslam
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>The classification of Flamstead under the Small Villages within the Green Belt section of Table 1 is Supported to an extent. This is because whilst Flamstead lies within the Green Belt, it is considered to be sustainable. This is because Flamstead is served by a Village Store/Post Office at the junction of Singlets Lane/Church Road; two Public Houses along the High Street, public transport/bus stop outside The Three Blackbirds PH on the High Street, a Church off Trowley Hill Road; a Village Hall off Church Road; Flamstead School off Trowley Hill Road; and Flamstead Cricket Club off Friendless Lane. There are also Allotments located on Singlets Lane. Flamstead also lies some 3/4 mile from the M1 (junction 9), which is accessed via A5183; a Petrol Station is located on the A5183, and a Harvester and Premier Inn are both also located on the A5183/M1 junction 9.</p> <p>Redbourn Golf Club/Course is about 1 mile away, and Aldwickbury Golf Club/Course is located some 4 miles from Flamstead.</p> <p>The nearest Railway Station to Flamstead is in Harpenden, some 3/4 mile away.</p>

With all of the above in mind, and on behalf of the Landowner, it is considered that a measured and in keeping new Housing development at in Flamstead ie. on Land lying to the west of Chequers Hill, will benefit the future well being, growth and economy of Flamstead:

The Land lying to the West of Chequers Hill covers an area of some 0.5 Hectares, 1.36 Acres (gross). This Land lies some 1/4 mile from the High Street, and 1/2 mile from Flamstead School.

The Land gently slopes, laid to pasture and has an agricultural wooden barn on the Land, located in it southern corner. Mature trees and hedges boarder the boundary of the Land with Chequers Hill, and a Footpath/Pavement runs along some 3/4 of the Land's boundary with Chequers Hill.

If the Land was developed for a measured/modest small infill of new Housing, then access could be gained to such an infill Housing development via a mini roundabout at the junction of Singlets Lane/Chequers Hill/Delmer End Lane;

The Land parcel outlined above has no previous Housing planning history, and is readily available for sustainable and measured new Housing developments, and should therefore be considered as such by the Council.

Please see Location Plans attached.

<b>Included files</b>	<a href="#">Land west of Chequers Hill Flamstead.docx</a>
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS364
<b>Person ID</b>	1260058
<b>Full Name</b>	Redbourn Parish Council
<b>Organisation Details</b>	
<b>Agent ID</b>	1260042
<b>Agent Full Name</b>	David Mitchell
<b>Agnet Organisation</b>	Redbourn Parish Council
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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>	The Settlement Hierarchy
<b>ID</b>	EGS405
<b>Person ID</b>	1260241
<b>Full Name</b>	BASSIL ASLAM
<b>Organisation Details</b>	
<b>Agent ID</b>	1259009
<b>Agent Full Name</b>	Bassil Aslam
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>The classification of Flamstead under the Small Villages within the Green Belt section of Table 1 is Supported to an extent. This is because whilst Flamstead lies within the Green Belt, it is considered to be sustainable. This is because Flamstead is served by a Village Store/Post Office at the junction of Singlets Lane/Church Road; two Public Houses along the High Street, public transport/bus stop outside The Three Blackbirds PH on the High Street, a Church off Trowley Hill Road; a Village Hall off Church Road; Flamstead School off Trowley Hill Road; and Flamstead Cricket Club off Friendless Lane. There are also Allotments located on Singlets Lane. Flamstead also lies some 3/4 mile from the M1 (junction 9), which is accessed via A5183; a Petrol Station is located on the A5183, and a Harvester and Premier Inn are both also located on the A5183/M1 junction 9.</p> <p>Redbourn Golf Course lies about 1 mile away, and Aldwickbury Golf Club/Course is located some 4 miles from Flamstead. The nearest Railway Station to Flamstead is in Harpenden, some 3/4 mile away.</p> <p>With all of the above in mind, and on behalf of the Landowner, it is considered that a measured and in keeping new Housing development at in Flamstead ie. on Land on the East side of Chequers Hill, will benefit the future well being, growth and economy of Flamstead:</p> <p>The Land on the East side of Chequers Hill covers some 3.2 Hectares, 7.8 Acres (gross).</p> <p>The Land lies some 1/2 mile from M1 junction 9, 1/2 mile from the Village Store, and 1 mile from Flamstead School. A bus stop is located some 100 metres from the Land, along Chequers Hill.</p> <p>The Land gently slopes, and has two access points should the Land be developed for new Housing; a pedestrian access could be provided to the Land between the houses called 'Bowling' and Sunny Ridge', with the main access to the Land via the existing farm gate opposite 'The Acorns' on Chequers Hill.</p>

This Land parcel outlined above has no previous Housing planning history, and is readily available for sustainable and measured new Housing developments, and should therefore be considered as such by the Council.

Please see Location Plans attached.

<b>Included files</b>	<a href="#">Land east of Chequers Hill Flamstead.docx</a>
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS449
<b>Person ID</b>	1260507
<b>Full Name</b>	Michael Burbidge
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	All 3 towns marked for development are already congested these development plans will only make this worse. I do not understand how Berkhamsted and Tring are sustainable locations. The only public transport is the railway and in Berkhamsted the development will be long way from the station. Some development in Tring will be close the station but most not.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS503
<b>Person ID</b>	1260803
<b>Full Name</b>	Rollo Prendergast
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I disagree with the assertion that Berkhamsted is a sufficiently sustainable location for significant development in the way the Plan envisages the location of new dwellings
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS512
<b>Person ID</b>	1260809
<b>Full Name</b>	James Mac
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The locations of the huge development areas around Tring and Berkhamstead can not be justified for environmental reasons. They will also directly change the make up of these locations taking away the market town feel.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS526
<b>Person ID</b>	1260814
<b>Full Name</b>	Mr Martin Ephgrave
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>Policy SP3 - The Settlement Hierarchy</p> <p>I wish to make comment on the wording applicable to 'Other small villages and the countryside' which suggests that no infill or brown field opportunities to develop, will be considered in some areas. Such wording will undoubtedly deny planners the ability to even consider future proposals, however realistic.</p> <p>Surely, councils should ensure there is enough housing to meet everyone's needs, therefore is it right to unilaterally prohibit any development in such areas AONB or not, thus ignoring the needs of a rural workforce and/or children of current inhabitants, which have undeniable history in such areas.</p> <p>Could we not resolve such prohibiting wording by allowing the statement to include a defined ability to utilise infill/brownfield opportunities, that don't contravene the separate identities of such hamlets or villages.</p> <p>I am concerned about particular villages which have such spaces within their habitable area, but have for too long been constantly denied any development opportunities, thus becoming elitist and expensive and financially discriminatory against children who have grown up within such villages.</p> <p>Indeed, past planning restrictions have denied development within these villages under the guise of AONB , but this has resulted in only a small minority of the populace able to enjoy such residency, denying even their own children, who have been born, bred and educated there from remaining, let alone agricultural workers who working in such villages.</p> <p>In conclusion I hope my comments can be considered and in some way incorporated in the proposed local planning guidelines.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS537

<b>Person ID</b>	1260255
<b>Full Name</b>	KTB Commercial
<b>Organisation Details</b>	
<b>Agent ID</b>	1260252
<b>Agent Full Name</b>	Peter Biggs
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>Policy SP3 sets out the settlement hierarchy identified within the Borough. It is noted that the description refers to all small villages as being the least sustainable area of the Borough, providing much lower level of facilities and where significant environmental constraints apply.</p> <p>It is acknowledged the purpose of Policy SP3 is to provide a broad categorisation of settlements to focus development in sustainable areas of the District. This policy however does over-generalise the description of villages and consideration of development opportunities within these villages.</p> <p>Whilst this statement may be true of other villages, it is a broad statement that does not acknowledge the location of Piccotts End in close proximity to the north of Hemel Hempstead.</p> <p>The village at Piccotts End is also located in close proximity to Growth Area HH01: North Hemel (Phase 1) identified for 1,550 new homes, new primary school and secondary school. Piccotts End therefore finds itself in a very sustainable location with bus services running through the main road through the village into Hemel Hempstead. There will also need to be further consideration through the masterplanning work how Piccotts End will sit alongside and benefit from the North Hemel Growth Area.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS557
<b>Person ID</b>	1260936
<b>Full Name</b>	Peter Hadden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Agnet Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS593
<b>Person ID</b>	1261122
<b>Full Name</b>	Mark Slade
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Add as much as possible to the existing large town, leave the rest alone.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS615
<b>Person ID</b>	1059789
<b>Full Name</b>	Mrs Alison Somek
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>The Settlement Hierarchy comment</b>	One of my main concerns here is that of protecting identities of local areas and ensuring the main tench of green belt separation between towns and villages. I am extremely concerned about a new proposal (not incorporated in this local plan) to exchanged the planned development in Berkhamsted with a huge development at Bourne End (Bulbourne Cross) which effectively would serve to connect Hemel and Berkhamsted on green belt countryside. I believe this should be strongly resisted.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS622
<b>Person ID</b>	1261183
<b>Full Name</b>	Oliver Fairfull
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>The Settlement Hierarchy 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?</p>

You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by such radical numbers will result in far more congestion and pollution – flying directly in the face of your environment plan. It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.

Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between properties, minimal parking and a minimal green space. Once they have been paid, they will leave and having irreparably changed the face of the town, we, and future generations will be left to suffer the consequences.

These new estates seen all over the country are the modern equivalent of tower blocks build in the 60s. We will look back in 50 years and wonder why anyone thought they were a good idea. The example to the west of Tring is a key demonstration of this. Decorating the house that face the main road with a pretty stone façade is just that, a façade. Look within the roads and you see narrow houses, squashed in at the edge of town, forcing people to drive to town. Maximising profits for developers, ignoring the real needs of the town inhabitants.

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

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

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS654

**Person ID** 1258939

**Full Name** Ed Shedd

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>Our main comment on the Settlement hierarchy is that it talks about a sustainable location as having the best access to a wide range of services, facilities and employment opportunities, whilst minimising the need to travel. And yet, the plan talks about using Green Belt land in Hemel Hempstead, an area which very much does not have access to these services, facilities and won't minimise the need to travel. When one reads the infrastructure plans for the new housing on the green belt, the solutions a) need to be built and b) are of the "car/carbon economy" era. There is talk about green corridors and multi-modal forms of transport, but no detail, or it seems, funding.</p> <p>In short, we would argue with the choice of Hemel green belt being the most sustainable location.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS705
<b>Person ID</b>	1261251
<b>Full Name</b>	Lesley Ashden
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>It seems sensible to develop Hemel Hempstead as it is not in the Chilterns and has good access to roads the A 41 bypass and the M1.</p> <p>The development in Berkhamsted and Tring is best at the edges of the town and near to good roads but it still needs to be tempered in quantity by the Green Belt and ANOB constraints</p>
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS724
<b>Person ID</b>	1261250
<b>Full Name</b>	Christina Thompson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This seems to suggest that Berkhamsted and Tring are being treated equally when Tring. Berkhamsted has a population of 10,000 more than Tring yet Tring is expected to grow by 2,731 homes, 500 more than proposed for Berkhamsted.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS734
<b>Person ID</b>	211245
<b>Full Name</b>	Ms Jody Conibear
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The settlement hierarchy states that Berkhamsted and Tring are sustainable locations for significant development but this cannot be a correct statement. By their very nature as market towns (i.e. small towns) neither Tring or Berkhamsted have geographical locations or infrastructure that will support sustainable growth without severe detriment to the local environment and those who live there. Tring and Berkhamsted high streets are already hugely congested due to their historical centres and small roads. By adding houses to the periphery (extending Tring population by <50%), this will

fundamentally lead to a degradation of life for those living in these areas. Access to town centres will need to be by car, there is no parking in the centre, small streets already heavily congested. It is total nonsense to expect that either Tring or Berkhamsted can take such a volume of new builds and new inhabitants.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS789

**Person ID** 1260046

**Full Name** Jude Jackson

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** I am totally against the significant increase in development in the market towns. They already struggle to cope with the current traffic and demands on resources - ie trying to get a GP appointment - with such a huge increase - they WILL NOT COPE AT ALL

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS869

**Person ID** 1143779

**Full Name** Ms Julia Marshall

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>The Settlement Hierarchy comment</b>	I support SP3, it is a logical hierachy
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS922
<b>Person ID</b>	1261540
<b>Full Name</b>	Ms Claire Taylor
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Piccotts End has not been included as a small village within the Green belt on page 33, as a village that is often mistaken for a hamlet, I believe this is a particularly large oversight, as the proposed plans impact Piccotts End in which I believe should be included alongside Potten End in Dacorum Emerging Strategy for Growth (2020-2038) paper, this directly contradicts the council's objectives for this housing development plan. As a small village within the green belt and as a conservation area protecting the village should be paramount, this development will not retain the character and keep our settlement separate to the areas it would become conjoined with. This misrepresentation of the village is consistent throughout all documents and does not 'develop a shared vision' to shape the neighbourhood, a message which is consistently reiterated as an important consideration within the plan.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS936
<b>Person ID</b>	1261172
<b>Full Name</b>	Barry Morris
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The proposal to build 150 houses and an 80 bed Elderly Persons Nursing Home on the 25 acre Grange Farm GREEN BELT land is not practicle. It will put a further tremendeous strain on the already congested High Street. The proposal to put land aside for a new school is not going to help the problem either. If or when a new school is built is a long way in the future, but the congestion problems are NOW and more housing will only add to the problem. Also why do we need another Elderly Peoples facility, when we already have Dudley House and the new Mountbatten dwellings. NO TO BUILDING ON GREEN BELT LAND IN BOVINGDON!
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS982
<b>Person ID</b>	488516
<b>Full Name</b>	mr hugh siegle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This Settlement Hierarchy should be rethought. Greater focus should be on Hemel Hempstead, best placed to absorb and benefit from new development. The market towns may be sustainable locations but Berkhamsted for instance has grown significantly under the Core Strategy despite being described as offering limited opportunity and is now at capacity. To add 24% more homes and a very significant increase in the town's footprint is not sustainable
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1017

<b>Person ID</b>	1260814
<b>Full Name</b>	Mr Martin Ephgrave
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>Policy SP3 - The Settlement Hierarchy</p> <p>I wish to make comment on the wording applicable to 'Other small villages and the countryside' which suggests that no infill or brown field opportunities to develop, will be considered in some areas. Such wording will undoubtedly deny planners the ability to even consider future proposals, however realistic.</p> <p>Surely, councils should ensure there is enough housing to meet everyone's needs, therefore is it right to unilaterally prohibit any development in such areas AONB or not, thus ignoring the needs of a rural workforce and/or children of current inhabitants, which have undeniable history in such areas.</p> <p>Could we not resolve such prohibiting wording by allowing the statement to include a defined ability to utilise infill/brownfield opportunities, that don't contravene the separate identities of such hamlets or villages.</p> <p>I am concerned about particular villages which have such spaces within their habitable area, but have for too long been constantly denied any development opportunities, thus becoming elitist and expensive and financially discriminatory against children who have grown up within such villages.</p> <p>Indeed, past planning restrictions have denied development within these villages under the guise of AONB , but this has resulted in only a small minority of the populace able to enjoy such residency, denying even their own children, who have been born, beed and educated there from remaining, let alone agricultural workers who working in such villages.</p> <p>In conclusion I hope my comments can be considered and in some way incorporated in the proposed local planning guidelines.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1119
<b>Person ID</b>	1143022
<b>Full Name</b>	Mrs Lin Phillips

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	Your hierarchy puts the market towns at risk of inappropriate levels of development, out of scale with their existing size and shape and damaging the quality of life for residents. The description which you have, allocated to the larger villages would describe a much more acceptable aim for Berkhamsted and Tring i.e:  "Growth in the large villages will be at a scale in keeping with their local character and setting. Sites are allocated to enable modest levels of expansion that reflects their role and function as well as other constraints to growth."
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1157
<b>Person ID</b>	1261809
<b>Full Name</b>	Pam Ferguson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Future housing does need to be spread across Dacorum but the housing numbers allocated to Berkhamsted and Tring are excessive. The infrastructure discussed in the plan, other than education, is not provided for this massive uplift in homes and therefore the towns are not sustainable locations. Providing a large number of additional homes will not necessarily have an overall positive impact on a town as suggested. In fact I think that an uplift of homes in Berkhamsted by 25% and in Tring by 50% will be extremely detrimental to these historic market towns.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1161
<b>Person ID</b>	1261837
<b>Full Name</b>	Kimberley Bond
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1190
<b>Person ID</b>	1261840
<b>Full Name</b>	Rachel Heath
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Can you be sure to keep the character of existing towns and villages? Excessive building is bound to alter the character. Are new sites proposed at the expense of developing pockets of land which would have less impact on the character of each area. I agree with the following comment:

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.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS1204

**Person ID** 1261875

**Full Name** Fiona Silver

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** Berkhamsted and Tring are not suitable centres for significant development because they cannot be developed without massive encroachment on Green Belt land and their infrastructures will not support such significant increase

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS1231

**Person ID** 1259116

**Full Name** Tring in Transition (TinT)

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1270
<b>Person ID</b>	1253872
<b>Full Name</b>	Georgia Huelamo
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>It is important that growth is focussed on the main towns first, before large villages - not simultaneously. Greater level of supporting services and other infrastructure will be key to ensuring access for social housing. It is of no use to social housing where there is limited infrastructure and poor access to transport links and facilities.</p> <p>I disagree that Tring and Berkhamsted are sustainable locations. There is no evidence that these settlements act as service centres for other villages. Significant development in these areas will seek to ruin the character of these market towns and create infrastructure, health and service capacity issues. Due to limited employment opportunities in these small market towns, large scale development will cause transport and environmental issues and change the character and heritage of the towns for future generations.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1276
<b>Person ID</b>	1145427
<b>Full Name</b>	Mr David Glenister
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>I disagree with the Settlement Hierarchy. Berkhamsted should remain an area of limited opportunity as in the current plan. There is no justification for the massive releases of Green Belt that will result in 24% increase in dwellings and 31% increase in urban footprint. . In practice the current approach is proving incompatible with preserving the character of our market towns and Berkhamsted in particular, which has received a disproportionately large amount of development to date – unsupported by any improvements in infrastructure; no new carp parks, no new roads, no change to sewage system, no new schools no new doctor surgeries &amp; dentists.</p> <p>The reality is that the first 13 years of the Core Strategy has seen development in Berkhamsted at a rate &gt; 30% above the target set, but with no infrastructure improvements to match, while development in Hemel is &gt; 9% below its target. This does not seem right considering the Market town's 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). Tacking on 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 inappropriate housing targets is not sustainable for the market town and will do irreparable damage. These plans will not enhance the quality of life for residents current or future. The Settlement Hierarchy should revert to the one ratified by the Core Strategy Inspector.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1309
<b>Person ID</b>	1261975
<b>Full Name</b>	John King
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes

<b>The Settlement Hierarchy comment</b>	ignores the individual chracter of TRING The major increase in population planned will cause town centre congestion which already exists
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1324
<b>Person ID</b>	1145350
<b>Full Name</b>	Mr Edward Murray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Per previous comments. There is a 1 high street in Berkhamsted and Tring, driving through them will become impossible with a 20% increase in the population
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1493
<b>Person ID</b>	1262216
<b>Full Name</b>	George Godar
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	We think that it should be made clearer that smaller villages (including Little Gaddesden) within the Chilterns AONB should not be developed in terms of infilling within the village in question. While it is understood that this is the intention of the content of the Table, it is considered that this could be reworded slightly to make it completely clear.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1630
<b>Person ID</b>	1262323
<b>Full Name</b>	Emma Hilder
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1778
<b>Person ID</b>	1154047
<b>Full Name</b>	Brendon Sparks
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	Dacorum Council should retain the Core Strategy Settlement Hierarchy as the new proposal 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. Clearly new houses have to be built in the area but NOT in the Green Belt areas nor at such density. The proposal will destroy the heritage, character and demography for all existing residents.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1804
<b>Person ID</b>	1262358
<b>Full Name</b>	Jennifer Scott
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>I disagree with the Settlement Hierarchy. Berkhamsted should remain an area of limited opportunity as in the current plan. There is no justification for the massive releases of Green Belt that will result in 24% increase in dwellings and 31% increase in urban footprint.</p> <p>The current approach is proving incompatible with preserving the character of our market towns and Berkhamsted in particular, which has received a disproportionately large amount of development to date – unsupported by any improvements in infrastructure. The proposed plans do not offer improvements that will make up for the deficit and really only offer infrastructure that is required as a minimum for the new settlements, while history dictates that if any ‘excess’ infrastructure is promised it rarely materialises.</p> <p>To be clear the Core Strategy Settlement Hierarchy states “Hemel Hempstead will be the focus for housing development within the Borough”, while recognising that the Market Towns are “Areas of Limited Opportunity” and “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”</p> <p>This Settlement Hierarchy was ratified by the Core Strategy Inspector who concluded that “the Council’s approach of focussing growth on Hemel Hempstead is justified.” The Inspector points to “the sustainability credentials” of Hemel and contrasts that to the Market Towns where “The level of services and facilities is lower than at Hemel”, while also confirming</p>

that “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”

The reality is that the first 13 years of the Core Strategy has seen development in Berkhamsted at a rate 31.2% above the target set, but with no infrastructure improvements to match, while development in Hemel is 9.3% below its target.

I believe 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).

Tacking on 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.

The Settlement Hierarchy should revert to the one ratified by the Core Strategy Inspector.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1887
<b>Person ID</b>	1262518
<b>Full Name</b>	Rachel Kempster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The proposed housing developments around the Hall Park area of Berkhamsted are 3-4km from the town centre, mainly up steep hills. The majority of people from this end of town already drive into the town centre due to distance/hills, so adding further houses to this area will only increase traffic and pollution. Pollution levels on Lower Kings Road already exceed 40/micro grams/cm3 limit. The developments here therefore are NOT sustainable.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS1908
<b>Person ID</b>	1262553
<b>Full Name</b>	Henry Wallis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1961
<b>Person ID</b>	1262604
<b>Full Name</b>	Ray Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Table 1. Although Berkhamsted itself offers existing facilities, here "Berkhamsted" is too broadly defined to be sustainable. Berkhamsted town may be outside the green belt, but its surroundings are, and much of the proposed expansion is on that green belt land. There is no mention of Northchurch, which adjoins Berkhamsted, but has its own council, history and distinct rural character. Northchurch is too far from Berkhamsted's centre to make expansion here sustainable without damaging its historic core. It should be in the same hierarchy as Potten End, which was once part of Northchurch.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS1964
<b>Person ID</b>	1262601
<b>Full Name</b>	Anne Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>Northchurch has not been identified at all in the DBC plan and has been given the misnomer of West Berkhamsted, this is simply not the case.</p> <p>Northchurch is defined as " a village and civil parish in the Bulbourne valley ... It lies between the towns of Berkhamsted and Tring" Wikipedia. It's origins go back 1000 years.</p> <p>The fact that this plan mistakenly alludes to Northchurch as a ribbon development of Berkhamsted indicates a total lack of DBC's local knowledge, awareness and sensitivities. This is a prime example of where the selection of build sites, such as Darrs Lane and Lock Field, has been made without this awareness</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2049
<b>Person ID</b>	1262738
<b>Full Name</b>	Alan Pierce
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

<b>* No</b>	
<b>The Settlement Hierarchy comment</b>	Whilst limited and sensible development in Berkhamsted and Tring is sensible, the rationale to change both market towns so significantly is flawed and inappropriate.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2087
<b>Person ID</b>	1262755
<b>Full Name</b>	Karen Johnson
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	The Settlement Hierarchy. Using Green Belt to fudge supposed improvements based on an outdated matrix for development is not the answer. We need new towns spread along new transport links (HS2) that are properly laid out and environmentally friendly and that encourage people to move and live throughout Britain (as suggested with the PM levelling up Britain plan) rather than just concentrated in the already over populated and over built up south of England. What happened to levelling up the country. Do we now really need all this housing we now have a massive death rate from Covid , low birth rate and at some point our top heavy older generation will die. The reason house prices are so high is because demand is great. Demand is great because we have train stations and transport links, improve these in other areas ie new towns and people will want to live in those too. Even if you build small houses in these areas they will still be expensive to buy, we have rows and rows of small houses in Berkhamsted and they are still pricy. Build new towns with nice things to offer and trains to major cities and people will want to live in them. Surely this is better than turning historic beautiful towns into concrete jungles with dreadful congestion and pollution. DBC should retain the core strategy settlement hierarchy as the revamped one fails to protect the historic character 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2106

<b>Person ID</b>	1262762
<b>Full Name</b>	Eric Dodman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I do not understand why Tring and Berkhamsted are seen as sustainable locations for massive development. There will need to be huge and fundamental changes within the towns to accommodate your plans and, apart from seeing nothing in your documents that provides any real detail about how you have come to this conclusion or, indeed, about what "sustainable" actually means, I do not agree with this plan.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2189
<b>Person ID</b>	1262765
<b>Full Name</b>	Paul Rees
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Kings Langley is an historic village - having been the capital of England in the late 1340s and it is a village in the green belt area. Therefore, it is entirely wrong for Kings Langley to be listed in the settlement hierarchy other than as a village with green belt, along with villages such as Chipperfield. The constraints that apply to villages such as Chipperfield should be seen as applying equally to Kings Langley. Kings Langley is an historic space with many beautiful views; and in order to maintain its important character it is vital to place the village in the same, more protected, category. And an urgent reduction should be made to the number of assumed new homes for Kings Langley. If 275 homes were added

to Kings Langley's current allotment, its character would be transformed from that of a historic village to that of a commuter town - and its current nature would be lost forever.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS2195

**Person ID** 1262841

**Full Name** Nada Ryan

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** The revamped Settlement Hierarchy will not protect the historic character and setting of Berkhamsted by facilitating a massive increase in dwellings and an even larger increase in urban footprint through the release of Green Belt.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS2220

**Person ID** 1262860

**Full Name** Susanne Rees

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Settlement Hierarchy comment</b>	The settlement hierarchy set out here is poorly thought through. Kings Langley - which is a unique village (given that it was the capital of England in the late 1340s) and a settlement that is in the green belt - is erroneously listed as a place for a comparatively high volume of new housing. This is wrong and should change. The idea that the historic village of Kings Langley could absorb an additional 275 new homes is farcical. If this many new homes were delivered (which would increase the population of Kings Langley to well over 6,000) the character and nature of Kings Langley would be changed forever. The number of new homes envisaged for Kings Langley must be drastically revised downward.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2256
<b>Person ID</b>	1262697
<b>Full Name</b>	Gillian Lindley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This section quotes Tring as being a service centre for surrounding villages and states this as a reason for significant development. Tring is a small market town whose facilities are barely adequate (and getting less so with shops, etc, closing) for the current population. Residents of Tring habitually shop in Aylesbury, Hemel Hempstead and Watford as the facilities in Tring are insufficient.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2261
<b>Person ID</b>	1262925
<b>Full Name</b>	Nandipha Jordan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p><b>The Settlement Hierarchy</b></p> <p>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.</p> <p>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.</p> <p>With the proposed scale of development these settlements will no longer be sustainable, they will be congested with residents who dont work locally, and add little to the local economy.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2283
<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 Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>BRAG disagrees with the Settlement Hierarchy. Berkhamsted should remain an area of limited opportunity as in the current plan. There is no justification for the massive releases of Green Belt that will result in 24% increase in dwellings and 31% increase in urban footprint.</p> <p>BRAG agrees with the theoretical broad approach and the ‘settlement hierarchy’ adopted in the Core Strategy.</p> <p>In practice the current approach is proving incompatible with preserving the character of our market towns and Berkhamsted in particular, which has received a disproportionately large amount of development to date – unsupported by any</p>

improvements in infrastructure. The proposed plans do not offer improvements that will make up for the deficit and really only offer infrastructure that is required as a minimum for the new settlements, while history dictates that if any ‘excess’ infrastructure is promised it rarely materialises.

To be clear the Core Strategy Settlement Hierarchy states *“Hemel Hempstead will be the focus for housing development within the Borough”*, while recognising that the Market Towns are *“Areas of Limited Opportunity”* and *“The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”*

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

The reality is that the first 13 years of the Core Strategy has seen development in Berkhamsted at a rate 31.2% above the target set, but with no infrastructure improvements to match, while development in Hemel is 9.3% below its target.

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).

Tacking on 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.

The Settlement Hierarchy should revert to the one ratified by the Core Strategy Inspector.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS2302

**Person ID** 1261830

**Full Name** alistair budd

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2345
<b>Person ID</b>	1262981
<b>Full Name</b>	Chris Mabley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	No reason is given for having a settlement hierarchy and there is no evidence of the local needs being catered for. Affordability of housing is a market price definition which is faulty for such long term plans. For example, not much housing stock pushes prices up so why would developers flood the market? Sustainability of mixed communities is much more complex and needs reference to up to date working data informed by Brexit and Covid 19, especially in light of their impact on transport requirements and green space for mental and physical health, as well as building regulations for climate emergency.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2353
<b>Person ID</b>	1262244
<b>Full Name</b>	Estelle Wraight
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	There is nothing sustainable about the locations suggested.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2369
<b>Person ID</b>	1261821
<b>Full Name</b>	Chris Cole
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The Settlement Hierarchy is flawed. It is based on an implicit assumption that towns have to become bigger towns, but villages have to remain villages so as not to spoil them. This is clearly wrong. The towns of Berkhamsted and Tring were once villages, and are now popular and picturesque towns - the proposal to grow them massively whilst protecting the smaller towns and villages will destroy their character, and turn them into suburbs of Hemel Hempstead. There should be a focus on growing the villages into popular, well-planned towns of the future with modern housing and infrastructure whilst maintaining the character and quality of life offered by the more mature towns rather than growing the latter to bursting point.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2405
<b>Person ID</b>	1227518
<b>Full Name</b>	Mr John LOWRIE

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	My major worry is the <b>Hemel</b> Garden Community project. This is built entirely on important green belt land. It seems to be that although it is too far from any existing infrastructure like rail links it is the 'easy' option to stick a massive housing estate on a green field with 5,000 houses and job done. The plan includes the creation of green spaces. Why? You have destroyed green belt land to create a green space. It doesn't make sense.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2499
<b>Person ID</b>	1263101
<b>Full Name</b>	Richard Hall
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I think the hierarchy is broadly correct. I have significant concerns the rural open spaces will be impacted disproportionately due to increased numbers of local residents.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2522

<b>Person ID</b>	222269
<b>Full Name</b>	Georgina Tregoning
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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. The plan is wholly disproportionate in terms of growth for Tring and Berkhamsted. Surely there can be no justification in building sufficient new houses in Tring solely to allow for another secondary school.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2541
<b>Person ID</b>	1263174
<b>Full Name</b>	katey adderley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The Core Strategy Hierarchy was much better. this one is bonkers at it allows a massive increase in dwellings by building on green belt
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2546

<b>Person ID</b>	1159198
<b>Full Name</b>	Edward Hatley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2552
<b>Person ID</b>	1263183
<b>Full Name</b>	Claire Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	Describing Berkhamsted and Tring as sustainable locations makes no sense, have you walked through either and observed the traffic problems?
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2569

<b>Person ID</b>	1262037
<b>Full Name</b>	Jason Silver
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The proposed growth of Berkhamsted in the plan (approx 25% in dwellings and 30% in population) will drastically change the character and nature of the town. Currently the infrastructure and traffic flow is insufficient for this increase.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2592
<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 Full Name</b>	Andrew Farrow
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2623

<b>Person ID</b>	1145686
<b>Full Name</b>	Mrs Sarah Gray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Berkhamsted and Tring These market towns are sustainable locations - and are at the limits of their size. Growth will NOT be at a scale in keeping with their local character and setting.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2703
<b>Person ID</b>	1262737
<b>Full Name</b>	Andrew Cassels
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The development of Berkhamsted and Tring is disproportionate to the size of these small town. I suggest halving the development numbers whilst creating more employment opportunities so that residents can work locally.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2730

<b>Person ID</b>	1262731
<b>Full Name</b>	Julie Battersby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I have already emphasised that Northchurch and Dudswell regard their communities as being distinct and separate from 'Berkhamsted'. In many roads in these settlements there is only rural or semi rural provision of infrastructure (eg septic tanks, narrow roads) and environmental constraints do apply . I therefore expect Northchurch and Dudswell sites to be disaggregated from Berkhamsted and reclassified in the Settlement Hierarchy as a " Small Village within the Green Belt" not part of a Market Town.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2757
<b>Person ID</b>	1262722
<b>Full Name</b>	Colin McCready
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS2868
<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 Full Name</b>	Andrew Farrow
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2894
<b>Person ID</b>	1263430
<b>Full Name</b>	Pru Murray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I would disagree that the market towns of Berkhamsted and Tring are sustainable locations and focus for significant development. The historic natures of the town centres and access means that it is difficult to increase amenities in the centre, congestion is already a problem (especially in Berkhamsted) and 2,236 will add to this significantly. I would suggest a figure of 10-12% increase in growth over the period is a more achievable growth target and reflective of the needs of the Borough and of the towns involved.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2902
<b>Person ID</b>	1258862
<b>Full Name</b>	Tim Beeby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The plan results in an increase in size of nearly 25% for Berkhamsted and fails to protect it's historic character
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2910
<b>Person ID</b>	1263377
<b>Full Name</b>	Jane Messenger
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The large 'villages' are joined on to Hemel already. any further development will completely ruin these areas.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS2946
<b>Person ID</b>	1263440
<b>Full Name</b>	J Davies
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>The comment in respect of small vilalges that "This needs to be protected to ensure their rural character is retained and settlements keep their separate identities" should also apply to the market towns and large villages.</p> <p>Development can lead to economic progress, but it can also change the nature of an area - rather than "mixing" within the current community, large developments are by their very nature "something different". Significant development should be focussed around development which compliments and mixes with the existing area, rather than is just dropped on the side.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3138
<b>Person ID</b>	1262255
<b>Full Name</b>	AJ W
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	The settlement hierarchy as originally set out in the Core Strategy should be kept. The 'new' strategy for growth as outlined does not protect the historic settlements of Berkhamsted & Tring. In the case of Berkhamsted we will see a 24% increase in housing in areas of mainly greenbelt land.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3152
<b>Person ID</b>	1263498
<b>Full Name</b>	Peter Reynolds
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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 and selected expansion within the current communities that do not detract from the character of the areas.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3213
<b>Person ID</b>	1263566
<b>Full Name</b>	Frances Read
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>The Settlement Hierarchy comment</b>	The policy should be specifically geared to redevelopment in town centres not around the edges and out into the countryside
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3277
<b>Person ID</b>	1261609
<b>Full Name</b>	DEBORAH CROOKS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>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.</p> <p>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.</p> <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> <ol style="list-style-type: none"> <li>The strategy should be focusing on protecting the Green Belt to absorb carbon emissions and improve mental health and well being.</li> <li>The increase of population will obviously have an impact on the increase of traffic and pollution that is linked to this.</li> <li>The quality of life will be affected by the increase in density of housing and traffic.</li> <li>There should be a value on nature and this is a matter of emergency worldwide. when land is built on there is no going back.</li> </ol>
<b>Included files</b>	<a href="#">Screen Shot 2021-02-25 at 08.46.07.png</a>

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3360
<b>Person ID</b>	1263693
<b>Full Name</b>	Ruth Colderwood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3361
<b>Person ID</b>	1263652
<b>Full Name</b>	Andrew Lunn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The proposal growth of both Berkhamsted and Tring is far to great, the need for housing is not that great and what is being proposed is also not affordable. The land which is being put forward is Greenbelt land that lends to the Towns charm and none of this is being considered. Berkhamsted doesnt have the infrustructure to allow for this cgrowth and also it is going to affect the characterists and the charm of the town which is why i moved here in the first place.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3389
<b>Person ID</b>	1263124
<b>Full Name</b>	Andrew Criddle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	No Comment
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3420
<b>Person ID</b>	1263763
<b>Full Name</b>	Adam Kindred
<b>Organisation Details</b>	CBRE
<b>Agent ID</b>	1263757
<b>Agent Full Name</b>	Adam Kindred
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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 Bovington 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.

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 Bovington and Markyate at circa 10%. Incidentally, the figure for Kings Langley is also higher than the figure for Tring.

The distinction between Kings Langley and Bovington and Markyate is further highlighted in the Council's own evidence with Paragraph 2.30 of the Development Strategy Paper (2020) stating '*However, unlike Bovington and Markyate, it [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 Bovington or Markyate.

The Sustainability Appraisal November (2020) states '*Option Cii considers higher growth at the villages of Bovington 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.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS3426

**Person ID** 1207786

**Full Name** Anne Foster

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

**The Settlement Hierarchy comment** The Hierarchy is flawed because in determining the Hierarchy, for each settlement only 3 things are considered  
 Population  
 Facilities

Public Trnsport links with the main settlement ( Hemel)  
 ( Berkhamsted is considered to have good public transport links, but it should be noted, that there are no early morning or evening buses and a limited service at weekends)  
 It does not consider the constraints of settlements ( Greenbelt, topography etc), nor the intra town availability of public transport.  
 In approving the Core Strategy the Inspector specifically requested that the Hierarchy was re-examined to take account of the constraints of the settlements. The SHS fails to do this.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS3497

**Person ID** 1263810

**Full Name** David Tolfree

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agnet Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** Hemel can cope with the planned expansion even though it will eat up so much more green belt land and could end up merging with surrounding villages. Market towns will lose their feel and place as market towns if built up too much. The population within this area will grow to a point that these towns cannot cope with the infrastructure, drainage and sewerage.  
 #

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS3530

**Person ID** 1263821

**Full Name** Anne Isherwood

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	It should be made clear that small villages within the Chilterns AONB should not be developed with infilling. this appears to be the intention but it could be made clearer.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3557
<b>Person ID</b>	1263797
<b>Full Name</b>	Chloe Collins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3574
<b>Person ID</b>	1145631
<b>Full Name</b>	Mr Alastair Greene
<b>Organisation Details</b>	Clerk

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3595
<b>Person ID</b>	1263865
<b>Full Name</b>	Robin McMorran
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3610
<b>Person ID</b>	369415
<b>Full Name</b>	Mr Dacorum EnvironmentalForum
<b>Organisation Details</b>	Chair

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3665
<b>Person ID</b>	1263887
<b>Full Name</b>	Atherton Powell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The Market towns and villages can NOT sustain the proposed levels of growth. The urban and brownfield sites can and are crying out for investment and development.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3694
<b>Person ID</b>	1263908
<b>Full Name</b>	Thomas Burger
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	outdated
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3710
<b>Person ID</b>	1263921
<b>Full Name</b>	sarah diehl
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3789
<b>Person ID</b>	1263924
<b>Full Name</b>	Susan Moore
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</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> <p>An overpopulated South East alongside deprived empty shopping centres in overlooked towns up and down the country is an irresponsible response to the future prosperity of the UK.</p> <p>Progress should be measured by putting the well- being of people living alongside nature in decent, regenerated towns and villages with character that build vibrant communities across the UK.</p> <p>We need to remind councils and politicians about their obligation to 'Level Up'; to provide a better environment for all across our country; to sustainably transform existing housing, shops and business premises and bring an end to out of town New Build.</p> <p>It is time to be innovative and make better things happen for everyone now.</p>
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3852
<b>Person ID</b>	1263982
<b>Full Name</b>	Lisa York
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3908
<b>Person ID</b>	1144948
<b>Full Name</b>	Mr Peter Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The statement that the market towns of Berkham sted and Tring - - act as service centres for other villages around them makes a strong case for limiting development. All the facilities of these town (infrastrucure, services, medical and traffic) are already at stretching point. A situation that will be exacerbated by further over development.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3928
<b>Person ID</b>	1264025
<b>Full Name</b>	Caroline Sherwen
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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. As said before - this town needs protecting - it's character, it's history and it's distinction from surrounding towns. It's what makes it function well for it's residents and the environment around it.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3930
<b>Person ID</b>	1263988
<b>Full Name</b>	Andrew Grout
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The large villages will grow slightly at a scale in keeping with their local character . Tring a beautiful Market town will have its character destroyed . Again why ?

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS3947
<b>Person ID</b>	1263016
<b>Full Name</b>	Joanna Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>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.</p> <p>Berkhamsted is a small historic market town with limited versatility in moving from one side of the valley to the other. 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" . This new plan fails to reflect this recommendation.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4059
<b>Person ID</b>	1262892
<b>Full Name</b>	Jean Farrer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

<b>* No</b>	
<b>The Settlement Hierarchy comment</b>	I particularly support the BRAG submission comments on the settlement hierarchy. I reiterate a point I made elsewhere that Northchurch should be reinstated as a settlement in its own right and have housing development proportionate to its population. It is not West Berkhamsted. You are not spreading the development fairly between the villages and are disproportionately focussing on Berkhamsted and Tring. In no way can you evidence you are controlling development in the countryside to protect the rural character of these market towns.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4088
<b>Person ID</b>	1264210
<b>Full Name</b>	Fiona Fulford
<b>Organisation Details</b>	myself
<b>Agent ID</b>	1264200
<b>Agent Full Name</b>	Fiona Fulford
<b>Agent Organisation</b>	
<b>Yes / No</b> <b>* Yes</b> <b>* No</b>	Yes
<b>The Settlement Hierarchy comment</b>	This hierarchy all makes sense but the numbers to which they are applied are double the level they should be
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4116
<b>Person ID</b>	742793
<b>Full Name</b>	Mr Lawrence Sutton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>In section “Policy SP3 - The Settlement Hierarchy”</p> <p>“Market towns - Berkhamsted - These market towns are sustainable locations and will be the focus for significant development. “</p> <p>Berkhamsted is a small town with limited space because of its geographical location on steep hills and it is not sustainable to build ‘at least 2,200 new homes’ in this space. The infrastructure is not suitable to support such a large increase of houses.</p> <p>Nothing is sustainable about building houses on Green belt land.</p> <p>It is not sustainable to build so many homes on the outskirts of Berkhamsted on the steep sides of hills. These homes will significantly increase the number of car journeys in the town and resulting noise and pollution. More cars on the roads will also increase the risk for children walking to and from school in the morning and evening.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4118
<b>Person ID</b>	1264070
<b>Full Name</b>	Michelle Carnegie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>DBC should retain the Core Strategy Settlement Hierarchy as the revamped one will completely change the nature of Berkhamsted by allowing a 24% increase in dwellings and 31% increase in urban footprint through the release of Green Belt. The south side of Berkhamsted will become heavily populated but still have a significant journey into a town centre which simply doesnot have the space to expand significantly. The roads are old and narrow and already ridiculously congested the thought of adding such an increase in population will be disastrous.</p>

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4133
<b>Person ID</b>	1264064
<b>Full Name</b>	Melanie Ingram
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	SP3 offers descriptors of the towns themselves but makes no acknowledgement of settlement size, the number of amenities and facilities i.e. drs surgerys/ dentist / schools / care homes / shoping outlets etc available because the scale of size difference between Berkhamstead and Tring is almost 50% difference, for example many in Tring rely on Berkhamstead as a service centre and therefore Tring has been ill-defined
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4173
<b>Person ID</b>	1258646
<b>Full Name</b>	Jane Timmis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

**The Settlement Hierarchy comment**

**Markyate**

I object to the development proposed for Markyate. This is in reality **a small village that has been constantly added to**, with approximately 200 new homes in the past 15 years; and given that there is no parking left anywhere in the village there is certainly no more room for more cars or houses/people. In particular, it should be noted that the village High Street, where residents' cars have to be parked on the street, there is no space to park for shoppers, causing problems for the few remaining shops. In addition the one and only small car park off Hicks Rd also serves the GP Surgery and is permanently full. The development proposal for 215 houses at the North East end of the village is a site that is easily flooded at the bottom of the valley, where water runs off from the fields; and it is sited below the Luton Airport main westerly flight path; but most importantly it is **on Green Belt!** And a sensitive Chalk Stream, the River Ver, runs through it. **It is not sustainable** as there is virtually no useful public transport. Everyone has to use their cars who lives here. The main A5183 gets congested at rush hour and there is a paucity of foot paths for dog walking.

The River Ver has been over abstracted in past years; it is at risk of damage as a result of further developments needing an increased water supply. There are already issues in parts of Markyate with reduced water pressure. and we receive a number of warnings of inadequate supply every summer. There is no reassurance that sufficient water can be conjured up to supply ever increasing numbers of houses.

There is no secondary school. Those in Harpenden are reducing their intake from the villages, the alternatives are in Hemel Hempstead. And school buses are expensive.

The last development was badly supervised by DBC, resulting in an eyesore of inappropriate development, still unoccupied after 5 years; villagers **no longer trust DBC** to deliver homes that are sensitive to the environment. It was built over a large part of the local industrial area, reducing local business area and therefore local employment opportunities.

In the new plans some of the remaining shops and industrial area are being put forward for further development, snuffing out some new businesses, **in complete contradiction to the statement that The Plan wants to "maintain commercial enterprise and employment opportunities in the market towns and villages"**.

We have had a lot of infilling in the village recently and a further large development risks destroying the village's distinctiveness. We have had our fair share of development and cannot support any more!

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS4178

**Person ID** 1264269

**Full Name** Paul de Hoest

**Organisation Details**

<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>The Settlement Hierarchy 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>There is no logic to this settlement hierarchy other than the desire to cram as many homes as possible anywhere possible. In almost all these cases they will degrade the quality of life for these locations.</p> <p>It would be preferable to design and build a new internally consistent integrated town from scratch in a new location entirely if you were determined to build this level of housing. This could be in conjunction with neighbouring boroughs in the SW Herts Partnership Group.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4194
<b>Person ID</b>	1264301
<b>Full Name</b>	James Stringer
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	It is unclear as to why keeping "local character and setting" is important for large and small villages, but not for Tring. 55% expansion will change that character of any settlement - whether a small village or a supercity. Tring is a small

market town, with limited facilities. The policy SP3 gives no evidence of how the character of the market towns will be preserved - especially with plans to build on the green belt land that makes them such an attraction in the first place.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS4207

**Person ID** 1264306

**Full Name** Peter Williams

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** Buckinghamshire Council also supports the draft plan's settlement hierarchy as set out in Table 1 which aims to direct development to the most sustainable locations and avoid significant development in the rural areas. In particular we support the classification of Long Marston as one of the "least sustainable locations in the Borough" in the Settlement Hierarchy on page 33 with "restricted scope for development such as limited infilling within the selected small villages...reuse of buildings, and the redevelopment of previously developed land".

In association with the settlement hierarchy this Council welcomes the fact that the draft plan does not allocate the site for 3,000 homes at Long Marston (reference 155L) identified in the SHLAA update November 2020 given the potential for negative impacts on the Buckinghamshire area. However, if the reconsideration of housing need referred to above would lead the Council to consider allocating site 155L this Council would wish to urgently discuss such an intention via the Duty to Cooperate process.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS4255

**Person ID** 1261915

**Full Name** Eleanor Lovett

**Organisation Details** Landhold Capital

<b>Agent ID</b>	1261754
<b>Agent Full Name</b>	Eleanor Lovett
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>As a local landowner, EPV, and Landhold Capital as land promoter, agrees with the Council's proposed settlement hierarchy. It recognises that Hemel Hempstead is the most sustainable location in the Borough, with Tring and Berkhamsted the second tier settlements, followed by the three large villages of Bovingdon, Kings Langley &amp; Markyate. The differentiation between large and small villages is supported in particular, as this reflects the services and facilities on offer at the larger villages which means that such settlements are better placed to accommodate growth.</p> <p>However, the Council has not sought to maximise the development potential at the large villages through this emerging Plan, instead stating that 'Growth in the large villages will be at a scale in keeping with their local character and setting' and going on to refer to 'modest levels of expansion'. Landhold Capital considers this to be insufficient and inappropriate, given the high levels of housing need in the Borough and the sustainability credentials of the large villages, in particular Kings Langley, which would justify seeking greater levels of growth at these settlements.</p> <p>Given the proposed Green Belt release through the Plan, it is also considered that the settlement hierarchy should have given more consideration to the train station at Kings Langley, as Paragraph 138 of the Framework suggests that locations well served by public transport should be given first consideration in plan-making. It is therefore arguable that some differentiation could be applied to the large village category and the amount of development to be delivered at each of these settlements, when considering difference in the public transport offering at each settlement. This would help to ensure the plan is sound in that it is consistent with national policy as per Paragraph 35 of the Framework.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4276
<b>Person ID</b>	1264321
<b>Full Name</b>	David` Fox
<b>Organisation Details</b>	personal
<b>Agent ID</b>	1264318
<b>Agent Full Name</b>	David Fox

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This hierarchy makes sense but the numbers to which they are applied are double the level required as they are based on outdated ONS population assumptions from 2014 rather than the more recent 2018 figures.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4303
<b>Person ID</b>	1264325
<b>Full Name</b>	Olivia Halper
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4446
<b>Person ID</b>	1264316
<b>Full Name</b>	Melanie Turner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	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.  What are the timeframes for each development?
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4488
<b>Person ID</b>	1264395
<b>Full Name</b>	R Jane Dickson
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	From pdf document on Dacorum's website: P33, Table 1, Settlement Hierarchy.  Whilst Table 1 notes that smaller villages, some in areas of high landscape quality such as the Chilterns AONB, should have their rural character and separate identity retained, and that they offer restricted scope for development, the phrase "...development such as limited infilling..." could be interpreted as indicating that such infilling would be acceptable. However, in villages, e.g. Little Gaddesden, where the open fields between buildings are an integral part of the village's character, it would not be acceptable. Please could this wording be clarified?
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4513
<b>Person ID</b>	1264363
<b>Full Name</b>	Roselyn King

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnel Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4519
<b>Person ID</b>	1261836
<b>Full Name</b>	Richard Sutton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnel Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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. 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** The Settlement Hierarchy

**ID** EGS4570

**Person ID** 1145918

**Full Name** Mr Richard Tregoning

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** To increase Dacorum Borough Council by 30% and Tring by 55% takes no consideration of the infra structure needs, nor does it reflect any form of national growth, nor does it take into account the need for schools, health or recreation. This plan is in all aspects fundamentally flawed. Of course a plan for 2020 to 2038 is required but not based on algorithm long ago abandoned by Central Government. DBC is recklessly following a plan which has no basis in fact on population or economic forecasts

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS4601

**Person ID** 1264453

**Full Name** Fiona Hinton

**Organisation Details** Myself

**Agent ID** 1264426

<b>Agent Full Name</b>	Fiona Hinton
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The existing Core Strategy Settlement Hierarchy should be retained. This new proposed version completely fails to recognise or protect the historic character and setting of Berkhamsted. This is a ver attractive small town, site of an important early Norman castle where William the Conqueror received the submission of the English. The proposed Hierarchy reduces it to a 'service centre', which is completely inappropriate. I note also that the nature of Berkhamsted rising up the sides of a valley also make it inappropriate for this role, and that Tring is also a town of great character and not appropriate to be considered simply a 'service centre'. The proposed plans go completely against the government's own statement that "We should be clear that meeting housing needs is never a reason to cause unacceptable harm to such places".
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4629
<b>Person ID</b>	1264462
<b>Full Name</b>	Penny Clifton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This Settlement Hierarchy fails to protect the historic character, geography and environmentally sensitive location of Berkhamsted by allowing a 24% increase in dwellings and 31% increase in urban footprint. The plan is not 'sustainable' and 'significant development' would mean the town loses its character. Releasing green belt land runs counter to the overarching vision of an environmentally sound strategy.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4642
<b>Person ID</b>	1264477
<b>Full Name</b>	Vivianne Child
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	TR06 I think it will be impossible for Tring and Berkhamsted to maintain their market town personalities with the amount of new housing that is proposed.  The planned development in Tring of the Local History Musuem and Tring Market Auction site makes my head spin. Where will people park? How will the traffic be managed? I support the comments of Tring Market Auctions
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4708
<b>Person ID</b>	1143273
<b>Full Name</b>	Mr Mark Rogers
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The proposed expansion of homes in Kings Langley is around 10% and is unsustainable in consideration of the existing infrastructure. Being the closest point to the M25 has seen the number of standstill traffic increase in the Village as

populations numbers have grown further north in the Borough over the past few years. As the A41 traffic builds maore cars travel through the Village at peak times and off-peak hours have seen more increases too.

The charm and local character is being lost to solid traffic jams on the High St and further afield. There are fewer and fewer opportunities to avoid traffic as even the backroads fill up. Modest expansion may be the goal but a minimum 10% housing increase (PLUS windfall sites) in the plan will see further traffic chaos, and quesues for all services without adequately addressing the road infrastructure.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS4709

**Person ID** 1264485

**Full Name** Charlotte Brown

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agnet Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** DBC should retain the core strategy settlement hierarchy as the revamped one fails to protect the character and setting of Dacorum's towns with an exponential increase of dwellings and urban footprint through the green belt.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS4773

**Person ID** 1264491

**Full Name** Paul Wade

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agnet Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	The market towns are not sustainable locations without significant plans to improve infrastructure and employment, which the current plans do not provide.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4788
<b>Person ID</b>	1264475
<b>Full Name</b>	Simon Davies
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	The market towns' high street are collapsing, and no longer fulfil the functions set out in your table of settlement hierarchy. Again, the proposal is out of date and needs to be readdressed in the light of the pandemic and its effects,
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4829
<b>Person ID</b>	1264521
<b>Full Name</b>	Max Hidalgo
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	Berkhamsted and Tring are not suitable for further developmet especially if green belt is considered, council leaders must question UK and hertfordshire policy as green belt land must be removed from any plans and saved for the future generations to enjoy open space. It is well documented there are many other locations for developement
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4848
<b>Person ID</b>	1264524
<b>Full Name</b>	Karen Kang
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	There seems to be a focus on protecting "areas of high landscape quality" around the Chilterns but in my view land owned by the Box Moor Trust should have been placed in the same category.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4884
<b>Person ID</b>	1261255
<b>Full Name</b>	Sarah Lightfoot
<b>Organisation Details</b>	
<b>Agent ID</b>	1261248
<b>Agent Full Name</b>	Sarah LIGHTFOOT

<b>Agnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>I submit that the Settlement Hierarchy advocated by DBC in the 2013 Core Strategy and ratified by the Planning Inspector should be retained.</p> <p>The Core Strategy Settlement Hierarchy states that “Hemel Hempstead will be the focus for housing development within the Borough”, while recognising that the Market Towns are “Areas of Limited Opportunity” and “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.” The Inspector found “the Council’s approach of focussing growth on Hemel Hempstead to be justified.” He pointed to “the sustainability credentials” of Hemel and contrasted that with the Market Towns where “The level of services and facilities is lower than at Hemel”. He also confirmed 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.”</p> <p>DBC is now not only rejecting their own previous position but are also ignoring the findings of the Inspector. There is no justification for the massive releases of Green Belt that will result in 24% increase in dwellings and 31% increase in urban footprint.</p> <p>Berkhamsted has expanded significantly in the first 13 years of the Core Strategy and has already contributed to the housing target at a rate <u>31.2% above the target set</u>, but with no infrastructure improvements to match. In contrast, development in Hemel is <u>9.3% below its target</u>. Necessary affordable housing has not been delivered in this additional building – just expensive houses understandably preferred by developers.</p> <p>Berkhamsted is a valley town with congestion and poor air quality in it’s centre. With the housing already built, it has reached capacity. Additional housing on the scale proposed will be detrimental to quality of life for the residents.</p> <p>The Settlement Hierarchy should revert to the one ratified by the Core Strategy Inspector.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS4956
<b>Person ID</b>	1264544
<b>Full Name</b>	Bethan Fox
<b>Organisation Details</b>	Personal comment
<b>Agent ID</b>	1264539

<b>Agent Full Name</b>	Bethan Fox
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This hierarchy makes sense but the numbers to which they are applied are double the level required as they are based on outdated ONS population assumptions from 2014 rather than the more recent 2018 figures.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5027
<b>Person ID</b>	1264557
<b>Full Name</b>	Natalie Crane
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5038
<b>Person ID</b>	1264538
<b>Full Name</b>	Robert Theaker
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	You suggest that Tring and Berkhamsted should be grouped together as market towns, eligible for significant development. It would be more appropriate if Tring was regarded as a large village. Kings Langley (in the "village/limited development" category is certainly no smaller than Tring in terms of houses, shops etc. and not much smaller in terms of population.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5052
<b>Person ID</b>	1264258
<b>Full Name</b>	Fintan FitzPatrick
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5079

<b>Person ID</b>	1264550
<b>Full Name</b>	Kevin Fielding
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	There is no mention of the undoubted <b>character and setting</b> of Berkhamsted and Tring as Market Towns. Or indeed any record of the attributes of Hemel Hempstead as a place to live. Like for the outlying villages, the character of our urban areas must be noted and taken into account. I have only studied the South Berkhamsted development in detail, and this will certainly damage the character and setting of Berkhamsted Town. If the plan is allowed to progress, Berkhamsted will no longer be a market town in a valley surrounded by agriculture and the Chiltern Hills. It will be a town in an urban ribbon development valley, surrounded by hill top housing estates. Much of its character will be lost.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5109
<b>Person ID</b>	1264354
<b>Full Name</b>	Juliet Penaliggon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Berkhamsted (Covid lockdown excepted) is struggling to deal with the increased traffic generated by the recent housing developments; in particular access to the A41 along Shooters Way. The proposed developments will simply magnify this problem rather than provide any solutions. As a result traffic congestion will be increased, with no additional access to the A41 planned.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5151
<b>Person ID</b>	1264509
<b>Full Name</b>	Hannah Fox
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This hierarchy makes sense but the numbers to which they are applied are double the level required as they are based on outdated ONS population assumptions from 2014 rather than the more recent 2018 figures.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5186
<b>Person ID</b>	1264593
<b>Full Name</b>	Rebecca Mackenzie
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	If Berkhamsted & Tring get much bigger their characters will be destroyed. I don't see lots of homeless people on the streets of these towns. What I do see are local people struggling the afford private ownership or private rental of housing. If you are going to do anything, please supply low cost, secure, social housing.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5205
<b>Person ID</b>	1264608
<b>Full Name</b>	Nicola Beadle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This hierarchy makes sense but the numbers to which they are applied are double the level required as they are based on outdated ONS population assumptions from 2014 rather than the more recent 2018 figures.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5212
<b>Person ID</b>	1262647
<b>Full Name</b>	Carolyn Wallis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5224
<b>Person ID</b>	1264601
<b>Full Name</b>	Tania Barney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This proposal 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. I disagrees with the Settlement Hierarchy, Berkhamsted should remain an area of limited opportunity as in the current plan.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5256
<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 Full Name</b>	Kevin Rolfe
<b>Agent Organisation</b>	Group Director, Development & Planning Aitchison Raffety
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	We also agree with the continuation of the long-established settlement hierarchy within the DBC area, carried forward from previous adopted plans and as set out in <b>Policy SP3-Settlement Hierarchy</b> . That strategy continues to focus

growth in and around the most sustainable settlements including Berkhamsted which is the second largest town in the Borough.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS5263

**Person ID** 1263726

**Full Name** Andrew Gifford

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** For such historic market towns DBC have given little consideration in planning and development to preserve such areas and the continued over population of larger towns such as Hemel have created a reduction of green space and decreased the biodiversity of our environment(s), this will only be compounded by the approach and sites picked in line with the plan.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS5277

**Person ID** 1264532

**Full Name** Robert Clarke

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** No

\* Yes

* No	
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5321
<b>Person ID</b>	1264616
<b>Full Name</b>	Philip Daw
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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.  What are the timeframes for each development?
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5382
<b>Person ID</b>	1264048
<b>Full Name</b>	Alison Fraser
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	needs to be fully justified. I really do question that there is such a need for so much housing in this area. The birth rate is not going up, with covid and new variants; life expectancy may go down, and we also have Brexit. I'm also of the view that the housing that St Albans are building in the fields next to Hemel; should count as housing that is being built in Hemel; as in effect these estates will become part of Hemel rather than St Albans, won't they. How big is Hemel going to be and we haven't even got a local A&E. I also worry that the large villages will in effect become towns.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5392
<b>Person ID</b>	1264628
<b>Full Name</b>	sophie boden
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	I understand the logic of the settlement hierarchy. This doesn't address the locations you are choosing for the development. As stated in section 3, you want to significantly increase the size of Berkhamsted in the South. Where will this schooling be provided? If you expect some children to go to Victoria you are creating the same issue St Albans now has, where parents are driving their children to school and increasing the amount of traffic, pollution and ecosystem destruction. Again think about waiting until lockdown is over, consult with people in a more positive way and explore options like Bulbourne cross (I am not saying I advocate this but I think it should be put down as an option.)
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5423
<b>Person ID</b>	1264636
<b>Full Name</b>	Lynsey Bilisland

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The projected increase in new houses in Berkhamsted will ruin the historic market town and its character through the release of Greenbelt and an unsustainable increase in the number of inhabitants.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5455
<b>Person ID</b>	1264647
<b>Full Name</b>	Richard Burnell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5589
<b>Person ID</b>	1263380
<b>Full Name</b>	Martin Warden
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	<p>The concept of being a 'market town' would be lost as the proposed developments more than double that existing.</p> <p>In terms of Tring being a service centre, all locally based services have contracted over the years with many retail units in the high street and elsewhere being either vacant or charity shops. There is only one fuel outlet, no banking facilities and a part time post office.</p> <p>Employment opportunities are limited.</p> <p>The potential addition of a large retail store being built in the region of the Museum or in place of the current market square, auction rooms and fire station is clearly a laughable idea to those who live here - if it wasn't such a horrific possibility.</p> <p>Vehicular access anywhere near the museum area is already difficult at the best of times and could not be improved without destroying one of the town's most charismatic areas.</p> <p>The current access and parking arrangements for the high street are inadequate and cannot easily be improved. The needs of a new retail store would make this much worse and would take up the parking areas we already have.</p> <p>The concept of relocating the fire station onto Dursley Farm demonstrates total lack of local knowledge. On average, half of the retained fire crew run across the grass area between the station and the Eight Acres housing estate. There is no way that they could get to a Dursley Farm site in the maximum four minutes allowed for fire appliance turnout.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5595
<b>Person ID</b>	1262957
<b>Full Name</b>	Gregory Hukins
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	Site 18 and many of the sites that border the A41 are the beginning of the greenbelt, they are not served by public transport and are a considerable walk to the town centre, facilities and infrastructure. Development here will not minimise the need to travel it will have the opposite effect of increasing road traffic and air pollution in these areas. When the A41 was built there was an agreed green buffer zone to absorb noise and air pollution which you are now proposing to convert into housing. You will be aware of recent air pollution studies and rulings where this pollution is an acknowledged cause of death.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5596
<b>Person ID</b>	1264657
<b>Full Name</b>	Amanda Hutchinson
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	Berkhamsted and Tring should be areas of limited opportunity for development, not sites of massive expansion. Growth in the borough should be predominantly focused on Hemel Hempstead. The proposals for Berkhamsted and Tring would fail to preserve the character and nature of these towns and destroy much of their Green Belt land. Further development is impossible without significant supporting infrastructure, which would also dramatically affect the character of these historic market towns.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5598
<b>Person ID</b>	1264679
<b>Full Name</b>	Paul Firth

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Development within Berkhamsted is not sustainable. Most of the proposed bilding is at the top of the hill where most people will rely on their cars for travel in and out of town. The roads are already congested enough and polution levels on Lower Kings Road alread exceed the 40 micrograms/cm3 limit. There is nothing in the Plan to deal with this. It would be useful if DBC looked at a more up to date Air Quaility Action Plan a polution has increased since the current 2014-18 plan that is currently being used.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5618
<b>Person ID</b>	1144878
<b>Full Name</b>	Mr Peter Moore
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	By reference to the plan it is clear Tring is not sustainable without compromising the integrity of its neighbouring green belt and rural small villages. With the proposed development of Berkhamsted and Northchurch, there is a clear likelihood that by 2038 Berkhamsted and Tring will become one urban area with little open space separating them.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS5658
<b>Person ID</b>	1264710
<b>Full Name</b>	Jess Malcolm
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	We should be helping these communities. Aid the unemployed, fix buildings to make them safer to inhabit and make the land we have already built on more sustainable and efficient in regards to space. Expanding will make these issues worse not better!
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5716
<b>Person ID</b>	1264473
<b>Full Name</b>	Jane Read
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The additional sites proposed in the Strategic Housing Land Availability Assessment November 2020. Addendum to the AECOM. Site Assessment Study include a massive development of 3,400 houses at Long Marston despite 'significant constraints' highlighted in the assessment. These absolutely contravene your statement here that "This needs to be protected to ensure their rural character is retained and settlements keep their separate identities"

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5722
<b>Person ID</b>	1264678
<b>Full Name</b>	Tom A
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5761
<b>Person ID</b>	1264697
<b>Full Name</b>	Nicholas Wood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5817
<b>Person ID</b>	1264750
<b>Full Name</b>	Neil Joyce
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Tring is not a market town. Do such places still exist? It is definitely very different in character to Berkhansted which is a commuter settlement.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5831
<b>Person ID</b>	1264755
<b>Full Name</b>	Jane Edmonds
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5835
<b>Person ID</b>	1264752
<b>Full Name</b>	Chris Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>To be brief, 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.</p> <p>Berkhamsted is a small historic market town with limited versatility in moving from one side of the valley to the other.</p> <p>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". This new plan fails to reflect this recommendation and we have had 7 years of new building in Berkhamsted since 2013.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5869
<b>Person ID</b>	1264768
<b>Full Name</b>	Paul Shepherd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

* No	
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5928
<b>Person ID</b>	1264785
<b>Full Name</b>	Thomas Lloyd-Evans
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The existing Core Strategy should be retained. This proposal would destroy the character of Berkhamsted and surrounding green belt.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS5993
<b>Person ID</b>	1264797
<b>Full Name</b>	Robert Diehl
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	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 a 31% increase in urban footprint through the release of Green Belt.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6012
<b>Person ID</b>	1264030
<b>Full Name</b>	Sean Collier
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I strongly agree with the protection of rural villages, and with Hemel Hempstead as an area for sustainable development.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6035
<b>Person ID</b>	1145998
<b>Full Name</b>	Mrs Pauline Hughes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	Boxmoor is a village . No tower blosks for commuters. Families need gardens.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6044
<b>Person ID</b>	1264830
<b>Full Name</b>	Nigel Green
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The proposal for market towns to be areas of 'significant development' will defeat their whole purpose of being market towns and Tring and Berkhamsted will lose their character and appeal and become suburbs of Aylesbury and HJemel Hempstead. I strongly oppose uncontrolled unsustainable development in these locations.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6050
<b>Person ID</b>	1264772
<b>Full Name</b>	Adrian Slade
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6082
<b>Person ID</b>	1264816
<b>Full Name</b>	Christopher Nicholls
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6101
<b>Person ID</b>	1264855
<b>Full Name</b>	Joanna LARKINSON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6149
<b>Person ID</b>	1264834
<b>Full Name</b>	Ilina Jha
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The towns are already well-populated. Berkhamsted town centre already has congestion and poor air quality; this should not be made worse.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6173
<b>Person ID</b>	1264731
<b>Full Name</b>	Graham Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	It is very unhelpful to have a hierarchy of settlements with strict divisions which then form the basis of development. This methodology takes no account of the geographical location of each settlement and how it interrelates to surrounding ones and the countryside. Additionally, there are factors outside Dacorum boundaries that influence the centres of population. I thus do not agree of the way development is ffocused on the classifications here.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6180
<b>Person ID</b>	1264872
<b>Full Name</b>	Ben Penaliggon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This hierarchy makes sense but the numbers to which they are applied are double the level required as they are based on outdated ONS population assumptions from 2014 rather than the more recent 2018 figures.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6203
<b>Person ID</b>	1261819
<b>Full Name</b>	Alex Rathmell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6291
<b>Person ID</b>	1264884
<b>Full Name</b>	Max Ansell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Dacorum needs to review the status of Northchurch village given its distinct character, different, elderly population profile, limited access to amenities and rural nature - it is quite different from Berkhamsted and not part of the market town and far from Berkhamsted service, retail and transport amenities. It should be reclassified as a small village with similar amenities as Potten End. The restricted scope for development, high landscape quality including stunning views, Chiltern AONB and its rural character retained and its separate identity kept - as with other small villages in the category.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6313
<b>Person ID</b>	1263462
<b>Full Name</b>	Bourne End
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	Settlement hierarchy just sets up a bullying mentality that obliterates smaller communities on the fringes of the larger towns eg Northchurch is practically combined into Berkhamsted now.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6320
<b>Person ID</b>	1264916
<b>Full Name</b>	Kathryn Spall
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	I believe that the strategy set out in the policy whereby Berkhamsted will be subject to a 24% increase in housing will completely fail to protect the historic character of the town. This is also true for Tring. These small market towns will not be able to keep their character if the Green Belt is lost to housing estates.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6327
<b>Person ID</b>	1145844
<b>Full Name</b>	Dr and Mrs Melvyn Else
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	In Berkhamsted a large part of the new housing development is in areas which are not served by public transport and will require a significant increase in car usage.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6345
<b>Person ID</b>	1262933
<b>Full Name</b>	James Cunningham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	This plan will mean that Berkhamsted and Tring will no longer be market towns and the concept of large villages is perplexing. Kings Langley is 10,000 v Tring at 12,000. However, this plan will mean that Tring is no longer a market town but a large town!
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6362
<b>Person ID</b>	1264946
<b>Full Name</b>	Shaun Pope
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6380
<b>Person ID</b>	1264928
<b>Full Name</b>	Nicola Simpson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6398
<b>Person ID</b>	1264964
<b>Full Name</b>	Philip Heaphy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	<i>We think that it should be made clearer that smaller villages (including Little Gaddesden) within the Chilterns AONB should not be developed in terms of infilling within the village in question. While it is understood that this is the intention of the content of the Table, it is considered that this could be reworded slightly to make it completely clear.</i>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6399
<b>Person ID</b>	1264951
<b>Full Name</b>	Chris Perks
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	<p>It is not appropriate to regard Berkhamsted or Tring as prime areas for development. Berkhamsted in particular, set as it is on two sides of a valley, is already beset by: a lack of parking; insufficient school places, doctors, dentists and accessible hospitals; and traffic congestion through the high street and to/from the A41. Northchurch, an independent village, has been lumped together with Berkhamsted, undermining the objectives of supporting community health, well-being and cohesion given the level of new houses planned in Northchurch.</p> <p>The level of development planned along Shootersway is completely unacceptable and unsustainable. The few routes from this side of the valley to the schools and into the town centre are already heavily over-used and congested, and these fields form the green lungs around Berkhamsted which are treasured by so many of the residents.</p> <p>Focusing growth on the "large towns and villages" essentially means that you would be destroying the character and nature of those "large towns and villages" and, rather than distinct local communities, we will end up with a conurbation of unbroken development from Hemel Hempstead to Tring.</p> <p>The suggestion that Berkhamsted and Tring have "access to a greater level of supporting services, facilities and other local infrastructure" is laughable, when both towns are already over-stretched and over-populated (anyone who has seen the long queue to get into the supermarket car-parks at the weekend will understand this).</p> <p>If t a key objective of the plan is "minimising and managing the requirement for development on Green Belt land and</p>

the impact on the Chilterns AONB, this is undermined by the plans to build houses in exactly these areas - simply because the council is required to hit a government target, that doesn't make these areas fair game for development - other options should be considered, including a challenge to the apparently arbitrary target for new houses.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS6425

**Person ID** 1264936

**Full Name** Jane Cracknell

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** Please see previous comment about unsuitability of specific sites in Berkhamsted. In addition more development in Berkhamsted risks losing the character of the town which at present brings in people from other areas. Getting rid of green fields risks an urban sprawl with overstretched services and too much traffic. Schools, health care and parking are already stretched.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS6430

**Person ID** 1264949

**Full Name** Evelyne Brocas

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	Northchurch is mixed in with Berkhamsted in the plan but we are a small rural village with limited sustainable opportunities for development without encroaching on our characteristic green belt - Northchurch belongs with the other villages in your hierarchy of settlements and the Local Plan needs to be changed accordingly so it meets village planning strategy
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6457
<b>Person ID</b>	1264982
<b>Full Name</b>	Rachel Heaphy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<i>We think that it should be made clearer that smaller villages (including Little Gaddesden) within the Chilterns AONB should not be developed in terms of infilling within the village in question. While it is understood that this is the intention of the content of the Table, it is considered that this could be reworded slightly to make it completely clear.</i>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6502
<b>Person ID</b>	1264906
<b>Full Name</b>	carol nutkins
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	Tring cannot accommodate the number of houses being suggested and it could be said the need is now not as great and should be reviewed. The services in Tring could not cope with a potential 50% increase in it's population. It does not have the potential for growth in employment and therefore many people will still have to travel outside for jobs and services. Building the majority of new homes on Station Road/Tring Station means even more cars going into town even if there is a bus service. The town already suffers with parking issues on residential roads and this will cause even more congestion problems. This cannot be seen as sustainable.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6548
<b>Person ID</b>	1264920
<b>Full Name</b>	Anna Wellings Purvis
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	This overlooks the character of Adeyfield, which enjoys a lot of green space and parkland and will change under these proposals.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6558
<b>Person ID</b>	1265007
<b>Full Name</b>	Duncan Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6636
<b>Person ID</b>	1265006
<b>Full Name</b>	Tracy Bownes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I agree with the proposed heirarchy. However, the extent of pressure that the housing target is placing strain on infrastucture in Hemel Hempstead, Barkhamsted and Tring communities is stark.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6659
<b>Person ID</b>	1263500
<b>Full Name</b>	Jessica Haigh
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6675
<b>Person ID</b>	1265019
<b>Full Name</b>	Yvonne Brener
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	the charchter of large and small villages are to be maintained, but you seem hell bent on wrecking the market towns. i presume the powers that be live in the villages. this document is over long and this process and website are complecated, I presume to stop people from commenting
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6693
<b>Person ID</b>	1261827
<b>Full Name</b>	Ian Brener
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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. Shocking  I endorse the CCG response to this document.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6752
<b>Person ID</b>	1265036
<b>Full Name</b>	Tom Burrows
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	They won't be market towns by the time you have built these developments and destroyed the towns of Tring and Berkhamsted!
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6796
<b>Person ID</b>	1265058
<b>Full Name</b>	Rick Ansell

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Northchurch needs to be given a place in the Settlement Hierachy. It is notable be its absence.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6803
<b>Person ID</b>	1265059
<b>Full Name</b>	Paul Austin
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Significant development to market towns will permanently destroy the concept of a market town and the green belt.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6844
<b>Person ID</b>	1265081
<b>Full Name</b>	Caitlin Neale
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6854
<b>Person ID</b>	1265072
<b>Full Name</b>	Peter Barker
<b>Organisation Details</b>	Me
<b>Agent ID</b>	1264829
<b>Agent Full Name</b>	Peter Barker
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Berkhamsted and Tring have already seen significant growth and the high street and infrastructure is already at capacity. Further development will destroy existing green belt land and these places will lose their character.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6855
<b>Person ID</b>	1265063
<b>Full Name</b>	Richard Scott
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6911
<b>Person ID</b>	1255375
<b>Full Name</b>	Louise Mousseau
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Berkhamsted has gone from 'not suitable for further development' in the previous plan - for a number of very good reasons relating to traffic, surface water run off and flood risk, lack of green spaces in the town - to suddenly fine for major development. There's no rationale for this other than you've been told to build more houses and you are just sticking them wherever you can now. Talk of sustainable development is also ridiculous when you are going to chuck houses all over greenbelt land.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6917
<b>Person ID</b>	1265074

<b>Full Name</b>	Stephen Wilson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6928
<b>Person ID</b>	1265105
<b>Full Name</b>	Jonathan Tay
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS6977
<b>Person ID</b>	1265116
<b>Full Name</b>	andrew Koutsou

<b>Organisation Details</b>	Me - resident
<b>Agent ID</b>	1265101
<b>Agent Full Name</b>	andrew koutsou
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Sustainable locations? what is the definition and context you use this in? it is not sustainable as a small town if you build 2,700 new homes in tring. I cant even get enough water pressure in wingrave road or park my car close to my house the fields at the back where i walk my dog and play with my kids will be the sight of 2,700 new homes? there is nothing sustainable about this in my opinion. Just overcrowding and straining on existing structure which is meant for a small town
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7031
<b>Person ID</b>	1262099
<b>Full Name</b>	Chris Taylor
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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 which is not sustainable given the lack of facilities available.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7038
<b>Person ID</b>	1263561
<b>Full Name</b>	Alexander Bhinder
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Too late to elaborate.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7081
<b>Person ID</b>	1265133
<b>Full Name</b>	Sarah Storey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Please see comments above. Proposed development in Tring is unjustified and disproportionate.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
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<b>ID</b>	EGS7098
<b>Person ID</b>	1265129
<b>Full Name</b>	Karen Foxwell-Moss
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The Core Strategy Settlement Hierarchy is the one which should remain. The proposed hierarchy falls far short of preserving the historic character and setting of Berkhamsted. A 24% increase in dwellings and 31% increase in urban footprint through the release of Green Belt is indefensible.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7121
<b>Person ID</b>	1265127
<b>Full Name</b>	Jason Foxwell-Moss
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The plan would adversely and irreparably damage the very nature of Berkhamsted life; destruction of the green belt, and the huge number of new inhabitants would put a huge strain on the local infrastructure, including more cars on the roads in Berkhamsted town centre, reigniting parking problems only just alleviated with the building of the multi-story car park
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7126
<b>Person ID</b>	1265088
<b>Full Name</b>	catherine Hay
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	DBC should retain the Core Strategy Settlement Hierarchy as the revamped one fails to protect the historic character and setting of Berkhamsted Northchurch.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7175
<b>Person ID</b>	1261685
<b>Full Name</b>	Ian Edwards
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The weighting of houses proposed for Tring is completely disproportional to the existing population and supporting infrastructure.
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7220
<b>Person ID</b>	1264956
<b>Full Name</b>	Caroline Heard
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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.  (7)
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7260
<b>Person ID</b>	1265027
<b>Full Name</b>	Saba Poursaedi
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	"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" how on earth does that work? Will a chunk of Hemel literally be part of St Albans? That doesn't make any sence
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7273
<b>Person ID</b>	1264957
<b>Full Name</b>	Mike Connell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7683
<b>Person ID</b>	1265757
<b>Full Name</b>	JENNIFER GAIL FREER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy 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 all. It has been called West Berkhamsted instead THIS IS UNACCEPTABLE.</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>	The Settlement Hierarchy
<b>ID</b>	EGS7706
<b>Person ID</b>	770860
<b>Full Name</b>	Mrs Heather Ebdon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>You are going to ruin our area!</p> <p>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!</p> <p>To accept the proposals would be lunacy on your part!</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7734
<b>Person ID</b>	1265778

<b>Full Name</b>	Councillor Lara Pringle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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> <p>The approach to Northchurch indicates a desktop approach with little</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7795
<b>Person ID</b>	1148738
<b>Full Name</b>	Ian and Claire Field
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	(6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS7865
<b>Person ID</b>	1265975
<b>Full Name</b>	Clare Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	(6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS8067
<b>Person ID</b>	1266048
<b>Full Name</b>	RACHEL MORGAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Settlement Hierarchy 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 all. 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>	The Settlement Hierarchy
<b>ID</b>	EGS8079
<b>Person ID</b>	1266049
<b>Full Name</b>	Mike Plowman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS8217
<b>Person ID</b>	1266154

<b>Full Name</b>	Iain Smith
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	(6): 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS8238
<b>Person ID</b>	1266155
<b>Full Name</b>	Annabel Carroll
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy 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>

— 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** The Settlement Hierarchy

**ID** EGS8310

**Person ID** 1266175

**Full Name** Anna Foster

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Settlement Hierarchy comment** We have lived in Northchurch for several years and truly appreciate its character and separation from Berkhamsted – we moved out of the main town to live here, for good reason. To now have it labelled as West Berkhamsted is outrageous and disrespectful– Northchurch is a historic place which predates Berkhamsted and its semi rural character, space and amazing views should not be violated by the proposed builds on Greenbelt, particular BK06 and BK07. The shops, churches, schools and social centre etc all make Northchurch what it is, a valued place to live, and I do not want to see this destroyed.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS8411

**Person ID** 1266234

**Full Name** LUCY DUGDALE

**Organisation Details**

**Agent ID**

**Agent Full Name**

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>&gt; 2/ Do you have any specific comments about the sustainable development strategy?</p> <p>&gt; —The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements.</p> <p>&gt; — This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this plan.</p> <p>&gt; — Northchurch has not been recognised at all. It has been called West Berkhamsted instead.</p> <p>&gt; — The local plan simply writes Northchurch out of existence, with no respect for its historical significance, limited infrastructure, or ecology.</p> <p>&gt; — 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>	The Settlement Hierarchy
<b>ID</b>	EGS8543
<b>Person ID</b>	211354
<b>Full Name</b>	Mrs Laura Sanderson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>There is no justification for the massive releases of Green Belt that will result in 24% increase in dwellings and 31% increase in urban footprint.</p> <p>To be clear the Core Strategy Settlement Hierarchy states “Hemel Hempstead will be the focus for housing development within the Borough”, while recognising that the Market Towns are “Areas of Limited Opportunity” and “The general</p>

approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”

The reality is that the first 13 years of the Core Strategy has seen development in Berkhamsted at a rate 31.2% above the target set, but with no infrastructure improvements to match, while development in Hemel is 9.3% below its target. I am certain 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

The Settlement Hierarchy should revert to the one ratified by the Core Strategy Inspector.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS8570

**Person ID** 1266567

**Full Name** CAROLINE SMALES

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

**The Settlement Hierarchy comment** 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.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS9093

**Person ID** 1267074

**Full Name** Joanne Howe

**Organisation Details**

**Agent ID**

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	(6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS9149
<b>Person ID</b>	211352
<b>Full Name</b>	Mr Andrew Sanderson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>There is no justification for the massive releases of Green Belt that will result in 24% increase in dwellings and 31% increase in urban footprint.</p> <p>To be clear the Core Strategy Settlement Hierarchy states “Hemel Hempstead will be the focus for housing development within the Borough”, while recognising that the Market Towns are “Areas of Limited Opportunity” and “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”</p> <p>The reality is that the first 13 years of the Core Strategy has seen development in Berkhamsted at a rate 31.2% above the target set, but with no infrastructure improvements to match, while development in Hemel is 9.3% below its target. I am certain that given its current size and topography, Berkhamsted has reached its limits of capacity. As conceded by</p>

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

The Settlement Hierarchy should revert to the one ratified by the Core Strategy Inspector.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS9231

**Person ID** 1264686

**Full Name** Suzanne Doubleday

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** 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.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS9257

**Person ID** 1267329

**Full Name** MARTIN DAVIES

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy 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>	The Settlement Hierarchy
<b>ID</b>	EGS9271
<b>Person ID</b>	1267330
<b>Full Name</b>	Kat Worth
<b>Organisation Details</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>The Settlement Hierarchy 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>

— 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** The Settlement Hierarchy

**ID** EGS9284

**Person ID** 1267333

**Full Name** JO MURPHY

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

**The Settlement Hierarchy comment** 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.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS9299

**Person ID** 1267332

**Full Name** Nandi Jordan

**Organisation Details** Chair  
 Berkhamsted and Tring Labour Party

**Agent ID**

**Agent Full Name**

<b>Agnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<p>The Settlement Hierarchy</p> <p>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.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS9359
<b>Person ID</b>	1267367
<b>Full Name</b>	Sarah Johnson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>The Settlement Hierarchy 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>

— 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** The Settlement Hierarchy

**ID** EGS9373

**Person ID** 1267368

**Full Name** Peter Leighton-Murray

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Settlement Hierarchy 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** The Settlement Hierarchy

**ID** EGS9387

**Person ID** 1267370

**Full Name** Patricia Beloe

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy 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>	The Settlement Hierarchy
<b>ID</b>	EGS9409
<b>Person ID</b>	1267392
<b>Full Name</b>	TANYA VERBEEK
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS9434
<b>Person ID</b>	1267398
<b>Full Name</b>	Alexandra and James Donaldson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy 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>	The Settlement Hierarchy
<b>ID</b>	EGS9449
<b>Person ID</b>	1267401
<b>Full Name</b>	JACKIE BELLAMY

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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 all. 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>	The Settlement Hierarchy
<b>ID</b>	EGS9476
<b>Person ID</b>	1267417
<b>Full Name</b>	Wendy and Paul Goodridge
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>The Settlement Hierarchy 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>	The Settlement Hierarchy
<b>ID</b>	EGS9505
<b>Person ID</b>	399324
<b>Full Name</b>	Ms Julie Hollway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<p>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 "<i>should only be altered where exceptional circumstances are fully evidenced and justified</i>" (NPPF, paragraph 136.</p> <p>SP2 (“Spatial Strategy for Growth”) and SP3 (“The Settlement Strategy”) are not agreed.</p> <ul style="list-style-type: none"> <li>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). <u>This is not what para 11 of the NPPF says</u>, 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.</li> </ul>

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;
- SP3 is based on an assumption that Berkhamsted is a “sustainable location”, and suitable for extension. It ignores proposed development would be on the outskirts (affecting Green Belt) and distanced from any public transport or shops (even if some are supplied during development). It also ignores how hilly Berkhamsted is and how walkers and cyclists will NOT walk or cycle but rather take cars (at least 2 per household) into town, yet again affecting road traffic and infrastructure. Have the planners visited the area and walked themselves into town and back with shopping? The proposed extensions of Berkhamsted, especially to the west, are not compatible with para 103 of the NPPF, which requires “significant development [to] be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”.
- 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** The Settlement Hierarchy

**ID** EGS9525

**Person ID** 1267427

**Full Name** Megan Humphreys

**Organisation Details**

**Agent ID**

**Agent Full Name**

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS9617
<b>Person ID</b>	1151590
<b>Full Name</b>	Lynda Clarke
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	6) DBC should retain the Core Strategy Settlement Hierarchy as this plan 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS9631
<b>Person ID</b>	1151590
<b>Full Name</b>	Lynda Clarke
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	(6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS9668
<b>Person ID</b>	1267468
<b>Full Name</b>	Chris Berry
<b>Organisation Details</b>	CPRE Hertfordshire
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<b>Chapter 6</b> on Settlement Hierarchy including Table 1, should be amended to delete references to the eastward extension of Hemel into St Albans District, which are dependent upon that area's local plan, not yet at a formal stage of preparation, and to 'significant growth' at Berkhamsted and Tring for the reasons set out in answer to Q1.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS9715
<b>Person ID</b>	1267480
<b>Full Name</b>	Paul Townsend
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS9790
<b>Person ID</b>	1267544
<b>Full Name</b>	CATHERINE HAY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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>	The Settlement Hierarchy
<b>ID</b>	EGS9851
<b>Person ID</b>	1267744
<b>Full Name</b>	GARETH BELLAMY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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 all. 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>	The Settlement Hierarchy
<b>ID</b>	EGS9916
<b>Person ID</b>	1267774
<b>Full Name</b>	AATMA SEESURRUN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10008
<b>Person ID</b>	1267858
<b>Full Name</b>	KATE & PHIL BAILEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The Settlement Hierarchy A 24% increase in the size of Berkhamsted will not protect the historic market town, the first 13 years of the Core Strategy has already seen development in Berkhamsted 31.2% above the target set, but with no infrastructure improvements to match, this has resulted in an already congested and polluted town. Building additional dwellings far from the centre of town will lead to further serious congestion and increased carbon footprint as more people make the journey into town by car at their own convenience, rather than using unreliable and inadequate public transport. It will put strain on local existing facilities and overload already pressurised local facilities.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10047
<b>Person ID</b>	1155402

<b>Full Name</b>	Christopher Stafford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	(6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10117
<b>Person ID</b>	1146091
<b>Full Name</b>	Mr John Foster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	<p>The local plan says very little about sustaining villages - we live in a village and want to keep it that way. 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.</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, increasing homogeneous ribbon development from Aylesbury to Watford.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10156
<b>Person ID</b>	1268071
<b>Full Name</b>	LINDA SLIM
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>—The local plan says very little about sustaining villages. 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.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10222
<b>Person ID</b>	1268167
<b>Full Name</b>	CHRIS YOUDELL

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10278
<b>Person ID</b>	399324
<b>Full Name</b>	Ms Julie Hollway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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 SP3 is based on an assumption that Berkhamsted is a “sustainable location”, and suitable for extension. It ignores proposed development would be on the outskirts (affecting Green Belt) and distanced from any public transport or shops (even if some are supplied during development). It also ignores how hilly Berkhamsted is and how walkers and cyclists will NOT walk or cycle but rather take cars (at least 2 per household) into town, yet again affecting road traffic and infrastructure. Have the planners visited the area and walked themselves into town and back with shopping? The proposed extensions of Berkhamsted, especially to the west, are not compatible with para 103 of the NPPF, which requires “significant development [to] be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”.
- 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.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS10396

**Person ID** 1268432

**Full Name** SARAH STUBBS

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10669
<b>Person ID</b>	1161079
<b>Full Name</b>	Melanie Llewellyn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	<p>There is no justification for the massive releases of Green Belt that will result in 24% increase in dwellings and 31% increase in urban footprint.</p> <p>To be clear the Core Strategy Settlement Hierarchy states “Hemel Hempstead will be the focus for housing development within the Borough”, while recognising that the Market Towns are “Areas of Limited Opportunity” and “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”</p> <p>The reality is that the first 13 years of the Core Strategy has seen development in Berkhamsted at a rate 31.2% above the target set, but with no infrastructure improvements to match, while development in Hemel is 9.3% below its target. I am certain 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</p> <p>The Settlement Hierarchy should revert to the one ratified by the Core Strategy Inspector.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS10688
<b>Person ID</b>	1268744
<b>Full Name</b>	DAVID FULLER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<ul style="list-style-type: none"> <li>The plan results in an increase in size of nearly 25% for Berkhamsted and fails to protect it's historic character</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10704
<b>Person ID</b>	1268746
<b>Full Name</b>	DANIEL GARROD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	I was under the impression that to remove Green Belt status any development strategy has to be fully evidenced and justified. It is my opinion that the growth proposed by this one is not sustainable nor respecting the environmental role of planning.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS10718
<b>Person ID</b>	1145421
<b>Full Name</b>	Mrs Shirley White
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10732
<b>Person ID</b>	1145586
<b>Full Name</b>	Miss Hannah Moynehan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	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.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10809
<b>Person ID</b>	1268768
<b>Full Name</b>	Amanda Stafford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	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.  (7)
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10830
<b>Person ID</b>	1268791
<b>Full Name</b>	ELIZABETH FULLER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Settlement Hierarchy comment</b>	<ul style="list-style-type: none"> <li>The plan results in an increase in size of nearly 25% for Berkhamsted and fails to protect it's historic character</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS10953
<b>Person ID</b>	1268886
<b>Full Name</b>	Mr Paul Jayson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS11343
<b>Person ID</b>	1269008
<b>Full Name</b>	Mr Steven Kerry
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnet Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>The Settlement Hierarchy comment</b>	<u><i>Policy SP3 – The Settlement Hierarchy</i></u> We object to the proposed settlement hierarchy on the basis that it does not differentiate between highly constrained areas and areas located outside of the designated areas. For example, Wilstone and Long Marston are two small settlements in the Rural Area that have the same restrictions to development as small villages within the Green Belt and / or AONB. Unlike Green Belt and AONBs, the Rural Area is not a national planning designation which restricts or limits development.  Wilstone and Long Marston are the only two settlements that fall outside these designations and are not surrounded by them which would otherwise limit the extent of growth in these areas. As such, these settlements should be placed within a separate tier which acknowledges their unconstrained locations.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS11377
<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	Policy SP3 – The Settlement Hierarchy: The Spatial Strategy for Growth (Policy SP2) correlates to the Settlement Hierarchy set out in Policy SP3, with the proportions of development directed to each of the settlements being relative to the sustainability of each settlement category. This approach is supported in order to ensure that development is first situated in or adjacent to the most sustainable settlements.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS11436
<b>Person ID</b>	1264362

<b>Full Name</b>	Juliet Miller
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<p>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.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS11458
<b>Person ID</b>	1261429
<b>Full Name</b>	Douglas Fisher
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	There is a major conflict between Policies SP3 focusing development on Hemel Hempstead and SP4 with its much larger percentage increase for Tring.

SP4 therefore needs substantial revision before the plan is submitted, particularly as the 16th December 2020 changes of Government policy and guidance need to be adhered to.

There is a similar basic conflict between DM39 and SP3 as the former will fail to comply with the Dacorum Hierarchy Strategy in the same way that CS6 has been shown to have failed. The Urban Capacity Study Appendix C shows that many more houses have been built in the adjoining countryside than within the small villages and DM39 will just make this worse as it is unnecessarily more restrictive than CS6 and NPPF Para 145 e)

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS11675

**Person ID** 1269212

**Full Name** PETER SCOTT

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** 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.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS11721

**Person ID** 1152494

**Full Name** MRS G RUSSELL

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Policy SP3: "Market Town" – see comments under 3c immediately above re Tring and villages around it. 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.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS11765
<b>Person ID</b>	1118045
<b>Full Name</b>	Mr Pdraig Dowd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</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>	The Settlement Hierarchy
<b>ID</b>	EGS11956

<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS12015
<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 Full Name</b>	Nathan McLoughlin
<b>Agent Organisation</b>	McLoughlin Planning
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	DBLP support the identification of Markyate as a “Large Village” under the Settlement Hierarchy contained in Table 1. It agrees that additional development in this location reflects the role and function of Markyate and is equally compliant with the provisions of the NPPF, particularly in respect of paragraph 78 in that Markyate is in the northern part of the Borough and performs a service centre function to surrounding rural community.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS12029
<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 Full Name</b>	Rob Shipway
<b>Agent Organisation</b>	Lead Consultant Civix
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The settlement hierarchy is a reminder that it is difficult to move away from the pre-eminence of Hemel Hempstead within the borough in the delivery of future employment growth. Herts LEP supports this hierarchy.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS12117
<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>The Settlement Hierarchy comment</b>	<p>6.1                    Although TSF will not comment on the amount of development proposed in Tring, it is worried that the current layouts lend themselves to unnecessary urban sprawl. Also, it is aware that others consider that the 55% proposed increase in housing as well as a large increase in the area of commercial premises is far too high – the charm of Tring as a town will disappear unless great care is taken to protect the environment. TSF believe that careful integration of hard developments with green field sports and leisure facilities would greatly assist in alleviating this.</p> <p>Developments should also retain or add to access to the canals, rivers and reservoirs for multiple leisure uses as well as angling and canoeing.</p> <p><b>Policy SP3 – The Settlement Hierarchy</b></p> <p>‘Market Towns- Description’ could read ‘.... focus for significant but sensitive development, incorporating a large number of green areas.’</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS12160
<b>Person ID</b>	1269444
<b>Full Name</b>	Mr & Ms Jim & Katie Barnard & Partridge
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	<p><u>Do you have any specific comments about the sustainable development strategy?</u></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>	The Settlement Hierarchy
<b>ID</b>	EGS12284
<b>Person ID</b>	1269485
<b>Full Name</b>	NICOLA HULSE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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</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 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** The Settlement Hierarchy

**ID** EGS12310

**Person ID** 1269489

**Full Name** STEVE HILL

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

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

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS12430

**Person ID** 1146040

**Full Name** Mrs Rachel Macdonald

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>The Settlement Hierarchy comment</b>	<p><b>The Settlement Hierarchy</b></p> <p>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.</p> <p>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.</p> <p><b>The Housing Strategy</b></p> <p>The housing strategy should reflect my vision given in question 1.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS12518
<b>Person ID</b>	1207806
<b>Full Name</b>	Mr Chris Graebe
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<p>The "settlement hierarchy" (Policy SP3) describes Berkhamsted and Tring as "Suitable locations for significant development". That may be the view of the planners, but not of the people living there.</p> <p>For Berkhamsted, taking large greenfield and Green Belt sites and increasing the size of the town by about a quarter is grossly excessive. The increase in pressure on the town's resources in all aspects, from roads to water supply and sewerage, will become intolerable. The housing plan for Berkhamsted goes way beyond what is acceptable, and could be met only by highly damaging developments in sensitive areas. Walking and recreation in nearby green spaces will be further limited. The Green Belt was created for a purpose!</p> <p>The proposed developments on the south side are remote from the town centre, meaning access to the town will be almost exclusively by road. There is no way of increasing the capacity of the roads to match the extra traffic.</p>

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS12587
<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy 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> <ul style="list-style-type: none"> <li>• This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this</li> <li>• Northchurch has not been recognised as 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</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>	The Settlement Hierarchy
<b>ID</b>	EGS12683
<b>Person ID</b>	1269591

<b>Full Name</b>	Ross Campbell
<b>Organisation Details</b>	Client Director Aberdeen Standard Investments
<b>Agent ID</b>	1269593
<b>Agent Full Name</b>	Jessica Wilson
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<b>Policy SP3 – The Settlement Hierarchy</b> It is agreed that Hemel Hempstead is the most sustainable location for development in the borough and should therefore be the focus of development. The Site is located within the urban area of Hemel Hempstead and therefore is considered appropriate for development in principle. Further information is provided in Section 3.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS12705
<b>Person ID</b>	1269600
<b>Full Name</b>	Alex Marsh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	—The local plan says very little about sustaining villages; We want vibrant self-sustaining villages that are not just dormitory settlements. <ul style="list-style-type: none"> <li>This is particularly apparent in the approach to the historic village of Northchurch, which has not been acknowledged in this</li> </ul>

- Northchurch has not been recognised as 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
- 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** The Settlement Hierarchy

**ID** EGS12804

**Person ID** 1144694

**Full Name** Mr Barry Fuller

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** • The plan results in an increase in size of nearly 25% for Berkhamsted and fails to protect its historic character

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS12812

**Person ID** 1269634

**Full Name** Frank Worth

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy 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>	The Settlement Hierarchy
<b>ID</b>	EGS13043
<b>Person ID</b>	1270013
<b>Full Name</b>	Mr Daniel Ritchie
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	<p>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.</p> <p>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.</p>

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS13161
<b>Person ID</b>	1270069
<b>Full Name</b>	Patrick Moloney
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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 as 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>	The Settlement Hierarchy
<b>ID</b>	EGS13176

<b>Person ID</b>	1144725
<b>Full Name</b>	Mr Philip Anderson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy 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 all. 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>	The Settlement Hierarchy
<b>ID</b>	EGS13209
<b>Person ID</b>	1270128
<b>Full Name</b>	Richard Salway
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<p>The Settlement Hierarchy</p> <p>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.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS13323
<b>Person ID</b>	1270200
<b>Full Name</b>	Mr Richard Harman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS13362
<b>Person ID</b>	924129
<b>Full Name</b>	Mrs Natalia McIntosh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	(6) DBC should retain the Core Strategy Settlement Hierarchy as the revamped one fails to protect the historic character and setting of Tring and 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS13389
<b>Person ID</b>	1153922
<b>Full Name</b>	Roger Hyslop
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	(6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS13404
<b>Person ID</b>	1270229
<b>Full Name</b>	Homes England
<b>Organisation Details</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	
<b>The Settlement Hierarchy comment</b>	We support Bovingdon as being classified as a “LARGE Village” in the settlement hierarchy and note the contribution that allocated sites within the settlement can make towards providing much needed housing, in a sustainable way.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS13437
<b>Person ID</b>	1270263
<b>Full Name</b>	MRS SHARON O'SULLIVAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	Proposed developments fail to follow the Dacorum Settlement Hierarchy

Policy SP4 shows that the plan is for 5500 new homes in Hemel Hempstead (Population about 95 thousand), 1870 in Berkhamsted (Population about 21 thousand) and 2200 in Tring (Population about 12 thousand)

The average household has 2.37 people according to the ONS figure for 2019. Hence the increase in homes is only about 14% in Hemet Hempstead but 21% in Berkhamsted and a massive 43 % in Tring, based on the figures in SP4, totally inconsistent with the overall strategy of the Dacorum Settlement Hierarchy which is primarily based on population size. The largest increase should be in Hemet Hempstead which is "the focus for the majority of development" according to Dacorum Policy SP3. Followed by Berkhamsted and then Tring. The allocation of new homes is the exact opposite of the Dacorum Settlement Hierarchy policy

The Settlement Hierarchy policy also expects any new housing in rural areas to be concentrated in villages rather than the open countryside. However, the evidence that the new Local Plan is based on suggests that this policy has completely failed in the past. Appendix C (Historic Windfall Data} of the Urban Capacity Study shows that over the 2006 to 2020 period the number of houses built within village envelopes is significantly lower than those built in the surrounding countryside. Under Policy CS6, for example, 3 new houses were built within the Wigginton village envelope but 11 were built elsewhere in the parish. The same applies under Policy CS5 where in Aldbury there were none at all within the envelope, but 14 elsewhere in the parish. Furthermore, this inconsistency will be made even worse with the adoption of the more restrictive policy DM39

Another inconsistency with both Dacorum and national policy is that new development should avoid the loss of Green Belt land. It is particularly important is that Areas of Outstanding Natural Beauty such as the Chilterns AONB should be protected from development. Whilst Dacorum has a large percentage of Green Belt land, it does have a significant area outside the Green Belt which should have been given more consideration than it seems to have been. Furthermore, whilst any extension of the three main towns is likely to encroach the Green Belt, that around Hemel Hempstead is not in the Chilterns AONB unlike Barkhamsted and Tring which are both surrounded by it.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS13439

**Person ID** 1270264

**Full Name** MRS JANE BROWN

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

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

<b>* No</b>	
<b>The Settlement Hierarchy comment</b>	I fully support the recognition for villages within the rural area that 'areas of high landscape quality, such as the Chilterns AONB and the countryside gaps between settlements... need to be protected to ensure their rural character is retained and settlements keep their separate identities.' Respecting the Green Belt is an important element of this protection.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS13539
<b>Person ID</b>	1260521
<b>Full Name</b>	Steve Ritchie
<b>Organisation Details</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>The Settlement Hierarchy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS13888
<b>Person ID</b>	1264756
<b>Full Name</b>	Kathryn Salway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	

<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<p>The Settlement Hierarchy</p> <p>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.</p> <p>To ensure future sustainability, there will need to be a significant shift to local employment, but there are no proposals in the plan to make the necessary employment space available for a change of this scale.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS13990
<b>Person ID</b>	1270412
<b>Full Name</b>	James Mullins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Aagnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	(6) 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>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14076

<b>Person ID</b>	1270478
<b>Full Name</b>	HANSEN L & H
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	A 24% increase in dwellings in Berkhamsted and a 31% increase in urban footprint fails to protect the historic character and setting of Berkhamsted. Berkhamsted has already received a disproportionately large amount of developments to date without any improvements in infrastructure. Given Berkhamsted's size and typography, Berkhamsted has reached its limits of capacity. Congestion is already bad enough in Berkhamsted. The quality of life for residents will deteriorate if these housing plans were to go ahead.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14247
<b>Person ID</b>	1152075
<b>Full Name</b>	Rob Wakely
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	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.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS14278

**Person ID** 1270629

**Full Name** Rob Bray

**Organisation Details** Head of Sponsorship & Fundraising  
Tring Rugby Club

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Settlement Hierarchy comment** (6) 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, likewise Tring.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS14291

**Person ID** 1270631

**Full Name** SIMON LEGG

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	I don't really understand what you are trying to sustain in this policy. There is little reference about sustaining existing villages, areas or communities such as where we live in Northchurch.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14347
<b>Person ID</b>	1270640
<b>Full Name</b>	Geoffrey Llewellyn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	<p>There is no justification for the massive releases of Green Belt that will result in 24% increase in dwellings and 31% increase in urban footprint.</p> <p>To be clear the Core Strategy Settlement Hierarchy states "Hemel Hempstead will be the focus for housing development within the Borough", while recognising that the Market Towns are "Areas of Limited Opportunity" and "The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs."</p> <p>The reality is that the first 13 years of the Core Strategy has seen development in Berkhamsted at a rate 31.2% above the target set, but with no infrastructure improvements to match, while development in Hemel is 9.3% below its target. I am certain 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</p> <p>The Settlement Hierarchy should revert to the one ratified by the Core Strategy Inspector.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS14522
<b>Person ID</b>	1270690
<b>Full Name</b>	Akzo Nobel CIF Nominees Ltd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	Our client supports the Council's proposed settlement hierarchy (Policy SP3) and the continued role of Berkhamsted as a market town and a recognised sustainable location and focus for significant development. It is noted that for housing completions between 2006-2019, Berkhamsted represented 13.8% of the Council's housing programme, second to only Hemel Hempstead <sup>1</sup> and therefore is a key urban area to accommodate future growth.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14730
<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<i>New development will be primarily focused at Hemel Hempstead and Berkhamsted, supported by the market towns, and large villages. The scale and distribution of development should broadly align with the settlement hierarchy set out</i>

*below and in each settlement's Delivery Strategy policies and proposals and sites that arises from it. Development will be controlled in the countryside in order to protect its rural character.*

*Table 1 Settlement Hierarchy*

*Category*

*Settlement*

*Description*

*Strategic Settlement*

*Hemel Hempstead*

***A 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.*

***Berkhamsted***

***A sustainable location in the Borough and focus for development and***

***infrastructure growth, alongside Hemel Hempstead. To include, planned expansions to the south and west of the town.***

*Market towns*

*Berkhamsted*

***These market towns is are a sustainable locations and will be the focus for significant development. These settlements-acts as a service centres for other villages around it them.***

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS14731

**Person ID** 1207558

**Full Name** Ms Jane Barnett

<b>Organisation Details</b>	Director Savills (on behalf of Taylor Wimpey)
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>DBC's Settlement Hierarchy Study (SHS) (October 2017) recognises Berkhamsted as the second largest settlement within the Borough with a 'high' accessibility rating and all the higher order services, to include all key services (such as schools, a post office, GP surgery, community and children facilities, supermarket, play space etc). It is stated to be a town centre that performs a district role and therefore has a much more strategic function when compared to Tring and is almost double in size in terms of population. As a result, DBC's SHS states that Tring sits below both Hemel Hempstead and Berkhamsted in the Borough's hierarchy.</p> <p>Berkhamsted therefore provides an opportunity for and has the provision and capacity to support significant growth alongside Hemel Hempstead which has been the focus for development over the last plan period and reached a certain "saturation point" as a result. 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" rather than a market town and elevated to sit alongside Hemel Hempstead in the Borough's Settlement Hierarchy.</p> <p>Savills' Planning Document (February 2021) provides a full justification which addresses settlement specific matters on housing growth, settlement distribution of growth and the Growth Areas themselves at Berkhamsted and should be referred to for further details. Overall, these amendments are considered important in ensuring the Plan can be considered to be positively prepared and effective in satisfying the NPPF texts of soundness.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14744
<b>Person ID</b>	1270760

<b>Full Name</b>	LQ Estates
<b>Organisation Details</b>	LQ Estates
<b>Agent ID</b>	1270759
<b>Agent Full Name</b>	Miss Hanna Mawson
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	4.3 SP3 carries through the main themes from SP2 to set out the settlement hierarchy for the Plan with Hemel Hempstead identified as a Strategic Settlement (first category) and Berkhamstead and Tring as Market Towns (second category). The market towns are identified as sustainable locations and the focus for significant development. It also acknowledges their role as service centres for other villages around them.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14836
<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 Full Name</b>	Mr Alistair Brodie
<b>Agent Organisation</b>	Henry H Bletsoe & Son LLP
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	Paragraph SP3 - We support the allocation of Hemel Hempstead as a strategic settlement, representing the most sustainable location in the Borough.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14878
<b>Person ID</b>	1144629
<b>Full Name</b>	Mrs SOPHIE LAWRANCE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p><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.</p> <p><b>Second</b>, 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.</p> <p>This is the case with Policies <b>SP2</b> (“Spatial Strategy for Growth”) and <b>SP3</b> (“The Settlement Strategy”). These policies are based on a fundamental misunderstanding of paragraph 11 of the NPPF, i.e. that a planning authority must “<i>make every effort to meet the housing, business and other development needs of an area</i>”<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.</p> <p>7 Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth, page 35 8 NPPF, paragraph 6(d)(i) and footnote 6.</p>
<b>Included files</b>	

<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14884
<b>Person ID</b>	1144629
<b>Full Name</b>	Mrs SOPHIE LAWRANCE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>Policy SP3 is based on an assumption that Berkhamsted is a “<i>sustainable location</i>”, and therefore suitable for extension, but this ignores the fact that the proposed development (especially that to the SW of Berkhamsted, like Bk06 - East of Darrs Lane and Bk08 - Rossway Farm) would largely be on the outskirts, distanced from any public transport or In fact, those developments will cut across land which is currently part of the parish of Northchurch - these portions of Green Belt contribute towards preventing the merger of South-West Berkhamsted and Northchurch at the top of the ridge. It also ignores the topography of Berkhamsted, which strongly discourages cycling (as the Plan itself recognises).<sup>29</sup> No material improvements are planned to Berkhamsted and Northchurch's current traffic situation, which is highly congested at peak times. The conclusion that Berkhamsted is a “sustainable location” is therefore questionable. The protections afforded to the villages within the Green Belt is appropriate, and should be extended to Northchurch which is incorrectly treated as "West Berkhamsted".</p> <p>29 Dacorum Local Plan Emerging Strategy for Growth 2020-2039, paragraph 2.13, p.15.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14916
<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 Full Name</b>	Sav Patel
<b>Agent Organisation</b>	Associate Director Strutt & Parker
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	Draft policy SP3 (The Settlement Hierarchy) prejudices future development away from villages such as Flamstead, which leave such villages susceptible to becoming house price hot spots and hold back their sustainability and growth. This would also have a detrimental impact on local services and facilities within the By stagnating growth, it would make it more difficult for local businesses and services to sustain themselves and consequently local residents would have to travel out of the village to nearby settlements. This is particularly problematic for sustaining key village services, such as village schools. Lack of housing prevents young families and school staff from residing in such villages, resulting in dwindling pupil counts and school staff retention issues.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS14944
<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 Full Name</b>	Ms Claire Newbury
<b>Agent Organisation</b>	Senior Associate Vincent and Goring
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<b>The Settlement Hierarchy</b>

HCC supports the settlement hierarchy set out within **Policy SP3**, which identifies Tring as one of two market towns within the Borough, which are considered sustainable locations for the focus of significant development, acting for service centres for surrounding villages.

The Settlement Hierarchy Study (SHH) published in 2017 identified Tring as one of three towns in the Borough. In assessing the relative performance and features of all the settlements within the Borough, the SHH found that, despite having half the population, Tring matched Berkhamsted in terms of presence of higher order services, provision of at least 6 Key Services, and high accessibility. On this basis, it does appear that Tring can support a higher level of housing growth than has previously been proposed, subject to impacts on the, townscape character, landscape and ecological constraints. This is particularly pertinent given the discussion below regarding DBC’s overall housing need given the Government’s latest adopted position in relation to calculating housing need using the 2018 Standard Methodology approach.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS15013

**Person ID** 1270845

**Full Name** DOMINIC LAWRENCE

**Organisation Details**

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**The Settlement Hierarchy comment**

Policy SP3 is based on an assumption that Berkhamsted is a “sustainable location”, and therefore suitable for extension. However, this ignores the fact that the proposed development would largely be on the outskirts of the town, distanced from any public transport or shops.[1] It also ignores the precipitous topography of Berkhamsted, which strongly discourages cycling. **The conclusion that Berkhamsted is a “sustainable location” is therefore very questionable.**

The proposed extensions of Berkhamsted, especially to the west (i.e. the Northchurch area), are not compatible with para 103 of the NPPF, which requires “significant development [to] be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”. The reality is that if

these sites are developed for housing, the occupants will be highly reliant on cars to get to central Berkhamsted / to access public transport to travel to London.

This point is recognised in supporting documentation. For example, in relation to proposed site Bk06, it is noted in the “Emerging Strategy for Growth Interim Sustainability Appraisal Report Appendices”, at page E-42, that:

*“This site is located a distance from the town centre, which would discourage walking and cycling, so there could be an increased use of the car and growth in the level of airborne emissions. However, the site is located relatively close to a number of local shops (in Northchurch) which could help to reduce these effects, as could the potential support for a bus service to serve this part of the town. Additional traffic created by the development at this site could add to existing problems in the AQMA at Northchurch.”*

There are grounds for scepticism about the chances of a useful bus service being provided; and the “local shops” referred to are in themselves quite some distance from the site. It is correct that the additional traffic generated by further development in this area would be likely to exacerbate existing air pollution issues in Northchurch High Street (and, no doubt, elsewhere).

Moreover, 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,[2] and will exacerbate already high levels of traffic congestion.

[1] The latter is likely to remain true even if a supermarket is built at Gossoms End (Growth Area Bk13), and there is “small scale retain provision” in Growth Area Bk01, as envisaged on page 47 of the ESG.

[2] The fact that train services are (or at least were, prior to the covid 19 pandemic) at full capacity is noted in the evidence base for the proposed plan.

<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15030
<b>Person ID</b>	1270846
<b>Full Name</b>	PETER ATKIN
<b>Organisation Details</b>	ASSOCIATE

<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<b>2.0</b> The identification of Bovingdon in Policy SP3 (Settlement Hierarchy) as one of the most sustainable large villages in the Borough is supported. This accurately reflects the strong sustainability credentials of Bovingdon as one of Dacorum's largest villages with an excellent range of local services, amenities, employment and public transport options to serve the day-to-day needs of the community. Bovingdon is considered capable and suitable to accommodate an additional sustainable level of growth to help meet identified development needs and ensure the future vitality and viability of the village and associated community services.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15038
<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 Full Name</b>	Stacey Rawlings
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	The settlement hierarchy at draft <b>Policy SP3</b> is acknowledged. Save for the concern over the reference to 'significant development' at the two market towns (for reasons expressed above), the proposed categorisation of settlements is appropriate.  <b>Green Belt:</b>  HLM agree with the Council that it is necessary to release land from the Green Belt in the Borough in order to deliver sustainable patterns of growth to 2038. Release of Green Belt land should not be considered unless there is no

unconstrained land available. There is not enough unconstrained land to meet the development needs of the Borough in a sustainable way. Therefore, the release of Green Belt land is justified as exceptional circumstances.

### **Housing Trajectory:**

The draft housing trajectory is found in the accompanying Housing Policy Topic paper. This should be included within the next version of the Plan for the Plan to be effective, positively prepared and consistent with national policy to significantly boost housing supply.

### **Buffer:**

At present the Council is proposing a housing supply of 16,900 homes to achieve a target requirement of 16,596 homes over the Local Plan period. HLM notes that the Council is only planning for less than a 2% buffer or 300 homes over the plan period. DBC is an authority which is constrained by AONB and Green Belt, thus making it important to robustly consider all opportunities for growth through the draft plan. We have raised matters of concern regarding the proposed site allocations and lack of evidence to demonstrate deliverability/capacity of some sites, more so those within Hemel Hempstead urban area. There is no flexibility in the plan if these sites are reduced in capacity or undeliverable.

The Council's annualised housing requirement rises to 922 homes from 2020 under the Standard Method approach. The latest residential land availability study for DBC published for 1 April 2020 monitoring year claims an average completion rate of 590 homes per annum over the past 5-year period, extract attached:

[see image 1]

This highlights the step change in housing delivery that is required by the new local plan. The delivery rates are unlikely to change for the first part of the plan period and HLM consider it necessary to include a reliable buffer to account for the delivery expectations of proposed sites. This should be at least 5% or 830 homes (NPPF para 73). The Council should identify additional developable sites, or at least reserve sites including additional safeguarded land that is capable of coming forward to enable the Local Plan to be sufficiently flexible to respond to changing circumstances. HLM consider the current strategy has a high risk of under delivery against housing requirements, principally due to the lead in times (and wider uncertainty) for HGC and availability of urban sites. This is critical within Green Belt authorities where it is necessary to maintain sufficient land supply over the whole of a Local Plan period.

Furthermore, the identification of land either as full allocations - or reserved sites - would accord with the NPPF requirement for authorities to boost the supply of housing (i.e. it would in any event be a sound spatial planning approach to over allocate land suitable for housing against LHN)

The recently published Housing Delivery Test results by MHCLG for 2020 indicates that DBC has not met its delivery requirements for the past 3 years against adopted Core Strategy targets resulting in an 89% measurement. The consequence of this is that it has to prepare an Action Plan. At para 7.25 the draft Plan suggests the Council will use a range of corporate actions including engagement with the development industry to speed up delivery should under-supply become persistent during the plan period. This is not a sound basis for plan-making.

The accompanying Housing Policy Topic Paper (November 2020) states that the draft Local Plan does not currently achieve a 5YHLS taking into account a minimum 5% buffer (paragraph 7.25), only achieving 4.5 years supply. On adoption

in 2022/23, this position is expected to improve slightly to 5.1 years, DBC acknowledge the 5-year housing supply will prove to be a challenge to the housing programme at paragraph 7.27 of the topic paper.

<b>Included files</b>	<a href="#">Image 1.jpg (1)</a>
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15056
<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 Full Name</b>	Mr Martin Friend
<b>Agent Organisation</b>	Director Vincent & Gorbing
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	<b>The Settlement Hierarchy</b> St William support the settlement hierarchy of Policy SP3 with its recognition of Hemel Hempstead as the only strategic location for growth in the Borough. In the Regulation 19 plan it would be helpful for the plan to set out how much development has been allocated to each level of the hierarchy and how this compares with the proportion of development represented by each category of settlement to demonstrate how the plan is focussing growth at Hemel Hempstead.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15095
<b>Person ID</b>	1270925
<b>Full Name</b>	Mrs Kathryn Salway
<b>Organisation Details</b>	Extinction Rebellion Dacorum
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>The Settlement Hierarchy</p> <p>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.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15117
<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 Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	It is also welcomed that Policy SP3 defines Hemel Hempstead as a 'Strategic Settlement', noting that Hemel Hempstead is the most sustainable location in the Borough and the focus for the majority of development and strategic and town-wide infrastructure.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy

<b>ID</b>	EGS15127
<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>Section 6 of the Emerging LP has regard to <i>The Settlement Hierarchy</i> to which <b>Policy SP3: The Settlement Hierarchy</b> is relevant and which acknowledges that the Borough of Dacorum is comprised of the Strategic Settlement of Hemel Hempstead, followed by the two Market Towns of Berkhamsted and Tring. The remainder of the Borough is comprised of Large and Small Villages in the Green Belt and the Rural Area, with Bovington being one of three Large Villages in the third tier of the Hierarchy.</p> <p>The policy states that growth in the Large Villages will be at a scale in-keeping with their local character and setting and that sites will be allocated to enable modest levels of expansion that reflects their role and function as well as other constraints to growth. As noted above, BPC acknowledges the role that Bovington plays within the Borough's Settlement Hierarchy and would expect that the village will take a modest level of additional growth over the Plan period. However, BPC would not expect that the village will accommodate any higher level of growth than that which is anticipated in the Plan at the present time, other than what may arise through 'windfall' development within the existing settlement boundary.</p> <p>BPC would expect that the proposed level of growth for Bovington within the Emerging LP is respected. If, during the Examination of the Plan, it is determined that there should be an uplift in housing numbers across the Borough, any additional growth should be directed towards locations in the more sustainable parts of the Borough, namely the main Strategic Settlement (Hemel Hempstead) and the Market Towns (Berkhamsted and Tring) in line with good planning practice.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15320
<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Settlement Hierarchy comment</b>	Policy SP3 sets out the settlement hierarchy and Berkhamsted is included as one of two market towns which are considered to be sustainable locations and a focus for significant development. Our client's support the settlement hierarchy and Berkhamsted's position within it.
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15471
<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	SEE ATTACHED RESP
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15480
<b>Person ID</b>	1271381
<b>Full Name</b>	Alison Walker
<b>Organisation Details</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	Yes
<b>The Settlement Hierarchy comment</b>	<ul style="list-style-type: none"><li>• Our comments regarding Policy SP3 are largely addressed under Policy SP2 and as such are not repeated here. We do however consider the first sentence of the policy should be updated which currently states:  <i>“New development will be primarily focused at Hemel Hempstead, the market towns, and large villages.”</i></li><li>• We do not consider this clearly reflects the hierarchy of these settlements and would suggest that the wording is replaced with the following which is replicated from that in Policy SP2:  <i>“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 of Bovingdon, Kings Langley and Markyate.”</i></li></ul>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15578
<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 Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

* No	
<b>The Settlement Hierarchy comment</b>	<ul style="list-style-type: none"> <li>We strongly support the proposed Settlement Hierarchy as set out and in particular the description of Hemel Hempstead being a strategic settlement and the most sustainable location in the Borough and the focus for the majority of development and strategic and town-wide</li> <li>As such, the focus for the shortfall in housing numbers must be allocated to the further growth of Hemel Hempstead and the allocation of Land at Shendish meets with this The other towns are already seeing significant levels of growth and any further allocations could lead to an imbalance and would not accord with the settlement hierarchy principles.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15585
<b>Person ID</b>	1271610
<b>Full Name</b>	MR SIMON MILLIKEN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Settlement Hierarchy comment</b>	EH Smith SUPPORT the Council's settlement strategy for growth within the large villages
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15586
<b>Person ID</b>	1271610
<b>Full Name</b>	MR SIMON MILLIKEN
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	<p>Whilst it is noted that the Bovingdon Brickwork site does not fall within the village confines and is being treated as a site within the 'wider countryside' (where development will be controlled), EH Smith consider that it would be more appropriate for the Bovingdon Brickworks site to be included under policy relating to the 'Bovingdon Delivery Strategy'/ 'Bovingdon Proposals and Sites' as opposed to the 'Countryside Proposals and Sites'. In sustainable development terms, there is a close connection between Bovingdon village and the brickwork site with respect to employment provision and new housing growth (240 dwellings). Indeed, historically many of the brickwork's workforce (circa 60 employees) came from Bovingdon village.</p>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15607
<b>Person ID</b>	1271748
<b>Full Name</b>	Ms Gosia Turczyn
<b>Organisation Details</b>	Wigginton Parish Clerk Wigginton Parish Council
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Settlement Hierarchy comment</b>	The WPC fully supports the principles behind the Dacorum Settlement Hierarchy but objects to the failure to follow this through by guiding development accordingly.

Policy SP4 shows that the plan is for 5500 new homes in Hemel Hempstead (Population about 95 thousand), 1870 in Berkhamsted (Population about 21 thousand) and 2200 in Tring (Population about 12 thousand)

The average household has 2.37 people according to the ONS figure for 2019. Hence the increase in homes is only about 14% in Hemel Hempstead but 21% in Berlhamsted and a massive 43 % in Tring, based on the figures in SP4. This is completely inconsistent with the overall strategy of the Dacorum Settlement Hierarchy which is primarily based on population size. Hence the largest increase should be in Hemet Hempstead which is "the focus for the majority of development" according to Dacorum Policy SP3. This is followed by Berlhamsted and then Tring, so the allocation of new homes is **the exact opposite of the Dacorum Settlement Hierarchy policy**

The Settlement Hierarchy policy also expects any new housing in rural areas to be concentrated in villages rather than the open countryside. However, the evidence that the new Local Plan is based on suggests that this policy has completely failed in the past. Appendix C (Historic Windfall Data) of the Urban Capacity Study shows that over the 2006 to 2020 period the number of houses built within village envelopes is significantly lower than those built in the surrounding countryside. Under Policy CS6, for example, 3 new houses were built within the Wigginton village envelope but 11 were built elsewhere in the parish. The same applies under Policy CS5 where in Aldbury there were none at all within the envelope, but 14 elsewhere in the parish. Furthermore, this inconsistency will be made even worse with the adoption of the more restrictive policy DM39

Another inconsistency with Dacorum and also with national policy is that new development should avoid the loss of Green Belt land. It is particularly important that Areas of Outstanding Natural Beauty such as the Chilterns AONB should be protected from development. Whilst Dacorum has a large percentage of Green Belt land, it does have a significant area outside the Green Belt which should have been given more consideration than it seems to have been. Furthermore, whilst any extension of the three main towns is likely to encroach the Green Belt, that around Hemel Hempstead is not in the Chilterns AONB unlike Barkhamsted and Tring which are both surrounded by it.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS15637

**Person ID** 1271974

**Full Name** EMILY FORD

**Organisation Details** SENIOR PLANNER

**Agent ID**

**Agent Full Name**

<b>Agnnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Settlement Hierarchy comment</b>	<ul style="list-style-type: none"> <li>• Further to our comments above, we support the identification of Berkhamsted as a focus for significant development and its position as a second-tier settlement in the hierarchy presented in Policy SP3. As recognised in the Settlement Hierarchy Study (October 2017), Berkhamsted is one of two market towns in the Borough and the second largest urban area (after Hemel Hempstead) with a population of 20,101. It offers a range of higher order services and key services and has a high accessibility rating, thereby making the town a sustainable location for</li> <li>• In the context of our comments above in respect of housing need, we consider that Berkhamsted offers a sustainable location for at least the quantum of growth proposed in the draft Plan (at least 2,200 new homes).</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Settlement Hierarchy
<b>ID</b>	EGS15667
<b>Person ID</b>	1272282
<b>Full Name</b>	Plato Estates
<b>Organisation Details</b>	c/o DLP Planning
<b>Agent ID</b>	
<b>Agent Full Name</b>	
<b>Agnnet Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>The Settlement Hierarchy comment</b>	<ul style="list-style-type: none"> <li>• We object to Policy SP3 ('The Settlement Hierarchy') on the grounds that it fails to recognise that some small villages, such as the village of Cow Roast, are in fact sustainable locations and offer opportunities for limited, sustainable redevelopment of sites for particular Our client's site to the east of Cow Roast, for example, is a site that is in a highly accessible location (see paragraph 6.15 below). We suggest that the wording in the final box of Table 1 (Settlement Hierarchy) is amended so that limited infilling is not just restricted to the 'selected small villages' identified in the table, but is allowed in all small villages where this is suitable, particularly on sites where it does not impact on the openness of the Green Belt or the character of the AONB:</li> </ul>

*“These are the least sustainable areas of the Borough, providing much lower level of facilities and where significant environmental constraints often apply. They offer restricted scope for development such as limited infilling within the selected small villages (although being more restrictive in the Green Belt than in the Rural Areas), reuse of buildings, and the redevelopment of previously developed land...”*

- This would ensure that the Local Plan aligns with paragraph 78 of the NPPF which states that *“Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”*. Limited development should not be restricted to just the seven small villages identified in the policy but should be allowed in *all* small villages where suitable sites are available and development is appropriate and in accordance with other plan policies.

**Included files**

**Title** The Settlement Hierarchy

**ID** EGS15709

**Person ID** 1273151

**Full Name** Ms Megan Green

**Organisation Details** Senior Planner  
Thakeham Homes Ltd

**Agent ID**

**Agent Full Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Settlement Hierarchy comment** Thakeham’s comments regarding Policy SP3 are largely addressed under Policy SP2 and as such are not repeated here. However, we do believe the first sentence of the policy should be updated. The first sentence is currently written:

*“New development will be primarily focused at Hemel Hempstead, the market towns, and large villages.”*

We do not consider this clearly reflects the hierarchy of these settlements and would suggest that the wording is replaced with the following which is replicated from that in Policy SP2:

*“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 of Bovingdon, Kings Langley and Markyate.”*

**Included files**

## 7 - The Housing Strategy responses

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8
<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>The Housing Delivery Strategy comment</b>	<p>Housing should not be given planning in Aldbury at all. This is green belt and ANOB. There is no good reason of any sort.</p> <p>You are not in control of transport infrastructure, or GPs and dentists. The infrastructure is massively oversreched as we are so any increase in population will lead to a complete collapse.</p> <p>Brexit is coming and popuation will not continue as previously foreacst so these ideas are out of date. My MP supports my views so should be included. You are going to create an environment of conflict over these plans as they are just not justifiable</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS17
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	7.11 'releasing green belt land to meet the housing need' I think this is inherently wrong. Green belt land is protected and for good reason. Our climate is changing rapidly, important habitats and eco systems are being lost, and without it we also put ourselves at risk from flooding and deterioration of air quality. We NEED these areas and if there is no other place to build, then we simply should not build! We should be making it a priority to protect these sites. Our town is also well known for its beautiful green belt land and building over it will destroy that reputation and just turn it into 'another big town'
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS25
<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> * <b>Yes</b> * <b>No</b>	No
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS42
<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>The Housing Delivery Strategy comment</b>	In Section 7.4 it states <u>“the needs of different sectors of the community including for affordable housing, housing mix, and specialist accommodation and this Plan supports new bed-spaces to help meet the accommodation needs of older people needing residential or nursing care”</u> . Does this included new properties ,such as small bungalows, which are in demand for senior citizens. Surly this must take precedence over the Gypsy and Traveller accommodation needs. Why is there a need to explore the future pitches and other forms of accommodation over the lifetime of the Plan while there are many people on the active housing waiting list, let alone many more on the non-active list.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS80
<b>Person ID</b>	482748
<b>Full Name</b>	Dr Ian 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>The Housing Delivery Strategy comment</b>	As per previous comments, this planned growth in housing is now against the revised government policy which is for most new housing to be in Urban Areas and in the North of England---not in farmland and Green Belt in the South East. Also such a groth of housing will result in water shortage during the future dry summers and also the loss of our Chlk Streams the River Gade and Bulbourne--these are protected waters.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS89
<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>The Housing Delivery Strategy comment</b>	I agree with item SP4 item 1(j) - please pursue development as stated in that paragraph, rather than in larger developments to the east of Berkhamsted.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS114
<b>Person ID</b>	1256427
<b>Full Name</b>	Katherine Hutton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I am extremely concerned about the impact that the proposed housing allocation would have on traffic, pollution and parking in Berkhamsted.

There is an extremely high level of traffic already on Berkhamsted High St, alongside several primary schools. There are currently no parking controls, encouraging commuters to travel to Berkhamsted from a wider area for free of charge parking.

There are already great parking difficulties for residents in the conservation area in Berkhamsted.

Any additional housing would add pressure to the on street parking in Berkhamsted from commuters. Fee-paying car parks will not be fully utilised while there is free on street parking.

Cycle links to all sides of town are poor and motor vehicles have been prioritised.

Large housing developments detract from the character of Berkhamsted, creating characterless housing, often with limited green space and no architectural value.

**Included files**

**Title** The Housing Strategy

**ID** EGS133

**Person ID** 1248941

**Full Name** Mr Stuart Findlow

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

**Included files**

**Title** The Housing Strategy

**ID** EGS144

**Person ID** 1256692

**Full Name** Cliff Slynn

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Too much green area has been allocated to housing
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS167
<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>The Housing Delivery Strategy comment</b>	<a href="https://www.thelandmagazine.org.uk/articles/why-building-more-houses-not-answer">https://www.thelandmagazine.org.uk/articles/why-building-more-houses-not-answer</a>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS172
<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	Yes
<b>The Housing Delivery Strategy comment</b>	I understand the plans will include sites for travellers and gypsies. I would like to understand more about this. The plan itself will overwhelm our town - we cannot accommodate more people!!!!
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS182
<b>Person ID</b>	1143215
<b>Full Name</b>	Susan Justice
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I am concerned about the proposed large increase in amount of house building around Tring and Berkhamsted. I understand that there is a policy to minimise the north-south divide in the country ( <a href="https://theconversation.com/proposals-for-house-building-targets-in-england-must-avoid-creating-a-north-south-divide-148475">https://theconversation.com/proposals-for-house-building-targets-in-england-must-avoid-creating-a-north-south-divide-148475</a> ) and that building more good quality housing in the north of England is a way of doing this. Building this large amount of housing in our borough will contradict this. It is not clear whether you have taken it into account.  Also, are the predictions for demand (as opposed to supply) being continually monitored? Drastic changes in the UK especially Brexit and Covid could affect demand and lead to a need for less housing. Many shops in high streets are closing and could be turned into housing which would keep these areas alive as well as satisfying some of the housing need.  Because of Brexit, we will need to grow more of our own food and building on green belt will remove agricultural land that could have been used for this.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS194
<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>The Housing Delivery Strategy comment</b>	These numbers are much too high and the call for sites method of identifying options is flawed, as it is driven by developers and landowners, not by planners.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS210
<b>Person ID</b>	1257490
<b>Full Name</b>	Lucy Muzio
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	You have stated that you have to deliver thousands of houses due to the high demands, housing lists and provide 'affordable' housing. However none what is provided currently is affordable. Until recently Hemel Hempstead has become one of the more expensive places to live especially you compare the house prices and rent to other areas. For price of a one bedroom flat in Hemel in Milton Keynes you can rent a three bedroom house for the same. Many people who currently live in the town can't afford it and they struggle. So who are exactly are you supplying these houses for? It

seems like none of this is being done for the current residents of Hemel Hempstead, but more for the London commuters' which are filling up the town so they can easily commute into London. Why do you need to build huge amount of houses over greenbelt areas when you have had plenty of areas in Hemel Hempstead that you could have used to build social housing and reduce the housing lists of people in need.

One example in a number of areas in Hemel Hempstead in 2014 the cabinet approved the disposal of 97 of Dacorum Borough council's garage sites. Many of these garages have now been knocked down for housing. However none have been used for social housing or by dacorum to provide housing for people sitting on the waiting lists? Instead they have been sold off to private developers which have built houses and then sold them on the private rental market for huge profits. In highfield one of the sites was sold to builders D.B Rees they built 7 houses these houses have been sold privately for 375,000 you can look this up on aitchisons.co.uk.

So my question again if housing is in such demand in Hemel Hempstead, that you feel the extreme need to build over greenbelt countryside and agricultural land the beautiful countryside and destroy agricultural farms which provide food, jobs a living and a home. Why are you not using any of the sites you have instead selling them off for the private housing market to profit on?

A lot of people are of the same opinion that the council is actually more interested in bringing people in from London and different towns rather than the own people of Hemel who live and the current plans you have made for the local plan is too big. It will do nothing but ruin the area of hemel you are trying to make it into something it is not. Catering for commuters from London and providing housing and properties for them rather than helping people already in the town, who can't afford to privately rent or buy because of the extortionate rental costs. How much of these proposed houses are actually going to be affordable? Maybe if something was done about the outrageous rental prices, maybe people would be able to afford to privately rent some of these houses which are sitting empty and then there wouldn't be such a demand for social housing. Building on all these houses and bringing more people into the town means one thing overpopulation. Currently as it stands Hemel Hempstead already does not have enough schools, some school children sadly missed out on places last September and didn't get one. There are not enough schools, not only this but we have no fully functional hospital for all these people it cannot cope as it is. Watford has already proved that it cannot cope with the demand and that was before covid-19.

Creating and building that many homes will be bringing in more people to an area that is already over populated and has no hospital. Will you be providing a fully functional hospital in the middle of this massive housing development to sustain all these new people and the current people who live here? I have also noticed on some of these plans that you are planning to build over are current hospital that we have. What prices will this 'affordable housing' will actually be affordable and will it actually benefit the people who live here? When none of it here currently is affordable, which is exactly why you have such a high housing list of people waiting for social housing?

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS212
<b>Person ID</b>	1258030
<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	Yes
<b>The Housing Delivery Strategy comment</b>	The site to the South of Berkhamsted (Bourne end side of Berkhasmgted known as Bulbourne Cross) could easily deliver the additional infrastructure required for additional housing. Also most importantly utilise existing road infrastructure and so should be the sole focus of additional housing in Berkhamsted.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS225
<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>The Housing Delivery Strategy comment</b>	SP4 DBC to be proactive in establishing housing needs and develop a framework based on evidence based studies and to not rely on developers commercial assessment.

Where housing is to be developed on green field sites, opportunity to restrict scale of footprints by including "green fingers" of landscape and wide pedestrian and cycling zones.

I welcome support for self build and custom housing to avoid more large scale estate developments.

**Included files**

**Title** The Housing Strategy

**ID** EGS226

**Person ID** 490644

**Full Name** Mrs Helena Holliday

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

7.7 says around 16,900 homes are needed to help satisfy the broad housing needs of our communities. However, much housing will be taken by **people wishing to move further from London**.

I understand that local authorities are obliged to have a current Local Plan in order to control development. DBC is obliged to provide for development of over 16,900 houses due to government policy. However, **government policy** seems to be on the cusp of changing because there is a move to change the focus of housing development from the south towards the north of the country (the "Northern Power House")

<https://www.pbctoday.co.uk/news/planning-construction-news/north-south-housing-crisis/84337/>

However, there still needs to be a current Local Plan to control development. I just hope that this plan will be revised to take into account changes in emerging government policy regarding the **levelling-up of the north/south divide**.

Also, authorities are meant to liaise on housing, which could **facilitate New Towns**, which can be planned holistically, for major developments.

If Tring is forced to accommodate the proposed level of extra housing (2,505) and population increase of 6,012 (from current 12,000), then it **must be accompanied by appropriate, timely and substantial infrastructure**– in addition to the planned schools and roads. I live in West Tring and it remains to be seen how the town will accommodate the needs of the 226 houses being built now (LA5), particularly for the Rothschild doctor's surgery in Western Road.

It is not sustainable to seal **Grade 2 agricultural land**.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS234
<b>Person ID</b>	1258552
<b>Full Name</b>	Rachel Conradi
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I understand the requirement for housing and employment and am pleased that the council are considering environmental, employment and housing needs. Nevertheless this plan (especially for housing) seems to be more about where landowners have asked for permission to build rather than where community need actually is.</p> <p>I live in Bovingdon. The village is already stretched out away from the village centre. Your proposals would make this worse. Where is the thinking about what and where our village needs housing? I see no evidence of this thinking here or else the plan for Bovingdon would be very different</p> <p>In addition the village infrastructure is collapsing as it is - we need a massive improvement to roads, doctors, dentists, hospital provision and a secondary school - - before any more housing goes in. There are massive issues that need to be dealt with before the housing and not after (when developers give you some money towards infrastructure).</p> <p>The plan calls for a move of the primary school out of the high street. This would be extremely detrimental to the retail in the village. Hence why is this good for employment and the local facilities?</p> <p>The green field site you are considering for a school would be put to much better use as a secondary school, of which there are definitely not enough secondary places in the local area.</p> <p>Lastly why build in these three areas when there is a massive brown field site next to the village? The airfield is not well used (albeit filming, drift limits and paintball it are taking place on some of the land) and a proportion could be used for housing? Has anyone asked the owners? One last point on this, with a relatively small cost, the road from the back of the airfield to the A41 could be upgraded to take traffic from Chesham, Bovingdon and any new housing on the airfield to the A41 and this would take massive pressure off of Box lane.....</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS250
<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>The Housing Delivery Strategy comment</b>	<p>I fully suport the idea of allowing more contemporary and innovating approaches to development, including supporting offsite construction and other forms of Modern Methods of Construction (MMCs). It is time to move on from the outdated idea that houses not made with bricks and mortar are substandard. This must be made clear not only to planners and developers but to the sources of finance such as mortgages who make it difficult to adopt new methods.</p> <p>We should be very careful about depleting the amount of green space. It has been known for some time that green spaces, including woodlands, are good for our wellbeing and this has been emphasised by the Covid crisis. Greenbelt should be used for development until all brownfield and other alternatives have been exhausted. There are commercial sites in the borough that are being left to rot whist their owners do nothing with the land. This should not be allowed.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS270
<b>Person ID</b>	1258885
<b>Full Name</b>	hattie mackinder
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
The Housing Delivery Strategy comment	The middle of Tring is not suitable for housing, as there are too many houses
Included files	
Title	The Housing Strategy
ID	EGS294
Person ID	1159328
Full Name	Nigel Hewitt
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
The Housing Delivery Strategy comment	<p><b>I am writing to object strongly to the proposed Dacorum Local Plan for increased housing.</b></p> <ul style="list-style-type: none"> <li>* We have a duty NOT to build on the Greenbelt. With the pressure on our environment and global climate change we need all the CO2 absorbing trees and plants. Once we build on Greenbelt it is gone forever! We have a duty to future generations to look after our environment.</li> <li>* Greenbelt land can ONLY be built on in EXCEPTIONAL CIRCUMSTANCES, houses do not come under this.</li> <li>* The Chiltern Hills are an area of Outstanding Natural Beauty, and our Towns and Villages have a unique character, this will all be lost with this proposal!</li> <li>* The actual numbers of houses that are proposed are all wrong! Far too many! The numbers have been worked out on a flawed computer model.</li> <li>*No thought has been given to the narrow roads and Historic Buildings, which will be hugely impacted by the vast increase in vehicles, and the number of additional journeys that will be undertaken!</li> <li>* No thought has been given to new schools and doctors, and infrastructure that will be needed.</li> <li>*This proposal will virtually start to join Aylesbury, Tring, Northchurch, Berkhamsted, Borne End, Hemel Hempstead into one long continuous conurbation!</li> </ul>

\*No thought has been given to the topographical lay of the land, which is unsuitable for building.  
 \* This Consultation needs to be extended, the proposals are so far reaching and important, that we MUST get it right!

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS333
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Greenbelt land should not be used for development of land as part of the housing strategy. Further evidence of levels of need/demand for housing will need to be sought after the pandemic as economic factors may change significantly which may impact on this so no firm commitments should be made until the impact of the pandemic is known. Environmental sustainability, preservation of wildlife ecosystems and achieving net zero carbon should be the key driving factors at this time.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS345
<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

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>We understand the logic of the housing strategy, <b>with the exception of</b> land to the west and south west of Hemel Hempstead. Why has c.50% of the housing supply been flagged for the north of Hemel, with very little in the South and West of the town?</p> <p>The siting of such a large development in North Hemel will only add to pressures on the CAOB and the Ashridge estate, which the local plan states it is only looking to mitigate. What does mitigate mean in this context?</p> <p>The National Trust has already stated that 2020 saw increases in traffic and visitor numbers, inspired by COVID and lockdown. An additional 16,000 homes, equivalent to c.25,000 to 35,000 cars, will only add to the pressure on the Estate and the CAOB. We would have expected to see very clear plans on e.g. the road systems to and around the estate to ensure that people can still access these areas, but not by increased car usage. The multi-modal transport systems envisaged for the Hemel Garden Communities should be extended to the CAOB and Ashridge estate. By which we mean. Ban access by car on the minor roads and put in place green walkways and electric bike, electric bus services.</p> <p>It feels as if this is one example amongst several which shows that the economic and social roles of the plan are being put ahead of the environmental roles.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS353
<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
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>In order to achieve a measured level of new Housing growth in small villages such as Flamstead, we Support the level of new Housing growth that needs to be delivered via Windfall sites ie. 2,408 new homes, as outlined in Table 2. Support is also given to Paragraph 7.17. especially with the Land lying to the West of Chequers Hill in mind, which is being promoted for consideration by the Council, as this Land is only 0.5 Hectares, 1.36 Acres (gross) in size.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS365
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS397
<b>Person ID</b>	1258770
<b>Full Name</b>	Graham Winwright
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

## The Housing Delivery Strategy comment

I offer conditional support for the draft Plan objective to deliver a step change in the number of new housing and for the locations identified subject to the Council taking my representations into account and acting upon them as far as possible.

I suspect my position will put me, as a local resident, in a very small minority of responses to this consultation but believe my suggestions could help reduce in future the numbers expected to oppose the planned scale of development.

I therefore believe this Local Plan presents an opportunity for the Council to reduce objections to housing growth in the Local Plan and even gain support from some local residents and groups. To achieve this I believe Council officers and members should challenge themselves and each other to explore ways to seek to achieve the opportunity presented below.

I also support the draft Plan objectives, particularly Health and Wellbeing of Communities, Responding to Climate Change and Enabling Infrastructure. However, I think the draft Plan fails to sufficiently advance these objectives for the existing built areas of Dacorum towns and villages (i.e. for the majority of local residents where most objections against growth emanate). I also believe the Community Infrastructure Levy approach will not go far enough to deliver necessary support or community compensation/gain for and from planned development. This is why I think there is a need for Council member/officers self 'challenge'. If this 'challenge' is appropriately addressed and articulated then I believe this could significantly help quiet and even change some of the 'majority voice' of anti-growth.

I believe the Council should embrace the responsibility for seeking to deflect community negative energy towards the draft Plan (and significant wasted public resources of the Council) away from objections, petitions, protests etc to enabling positive outcomes. These outcomes I believe should be real tangible benefits and positive changes to existing built areas, not just the planned growth sites, and for these changes to be clearly delivered as a result of new development. In addition I believe the Council should be committed to enabling local communities (wider than elected representatives and the 'usual faces' of local groups set up too or engrained in opposition to progress) to help identify what these changes should include.

Growth at Hemel Hempstead presents the Council with a great 'challenge' opportunity, particularly as:

- The level of growth proposed at Hemel Hempstead is very significant and will generate enormous revenues
- Major growth is planned on Crown Estate Land holdings where the Crown Estate objective should not be just financially motivated but to also seek wider community supported outcomes and a more lasting legacy
- The Crown Estate gains in land values as a result of the draft Local Plan proposals will be enormous while the 'cost' of the development to the wider community through loss of Green Belt, lost agricultural land, lost/damaged natural capital, increased strains on infrastructure, increased traffic generation, carbon footprint, etc will equally become enormous. The gains 'for a few' versus the 'losses to the many' is far too disproportionate and a major fuel for growth opposition. The Council challenge along with key stakeholders should be to some way reduce this gap to secure wider community support.

Creating a sustainable, connected and attractive development in the proposed growth areas with appropriate affordable housing and Community Infrastructure Levy is essential but, I suggest, not enough to deliver the plans overall objectives, not enough to gain public support and not enough to serve the existing Dacorum communities.

As a 1950's New Town there are significant environmental, social and infrastructure shortfalls and regeneration needs in Hemel Hempstead which do not appear to be able to be fully funded by the Council, County Council, Government or other identified means and which cannot be appropriately funded from the Community Infrastructure Levy.

New development itself will generate a very significant amount of carbon dioxide both during construction and after whilst also removing the current positive contributions to carbon dioxide reduction gained from agricultural Green Belt land. Imaginatively seeking to address this carbon footprint gap could help enhance the wider areas, particularly Hemel Hempstead as a garden city in need of regeneration, through for example new tree planting, retrofitting cycle tracks, community orchards, promoting biodiversity, encouraging health activities and enhancing existing open space areas.

The Council is proposing a Hemel Garden Communities Spatial Vision (HGCSV). This should equally be about positive changes and regeneration to existing neighbourhoods and not just about creating nice modern add on communities. So there is an ideal opportunity to deliver this Vision through the Local Plan, to help counter the community experienced and perceived negative impact of growth at Hemel Hempstead and present a lasting vision funded from new growth at Hemel Hempstead. The Council should not be satisfied with producing a 'great Vision' but determined to deliver that Vision for the whole of Hemel Hempstead and now has the chance and means to do this.

It is difficult to say how the Local Plan should link to the HGCSV until the vision is understood however the Council challenge I think should be to identify clear strategies, proposals and policies in the next version of the Local Plan to deliver the vision and explain the role of new development to achieve this. This could include the following for existing Hemel Hempstead neighbourhoods:

- 1 A programme of replacement and new tree planting in existing streetscapes (equality with the Government objective for new residential streets and original design/philosophy for Hemel Hempstead New Town)
- 2 A network of cycle paths and safe junction designs linking all neighbourhoods (new and existing) to the Town Centre, Maylands, local shops, schools etc to promote increased cycling
- 3 Investment into existing local centres to deliver environmental improvements and where necessary community facility replacements or up-grades (e.g. community centres, medical centres)
- 4 Investment in passenger transport highway priorities and routes and to achieve better user experiences
- 5 A new approach for existing local open spaces to secure greater and enhanced community use, increased biodiversity, carbon off-setting and visual enhancement
- 6 Funding for local community or environmental generated projects such as community orchards, public art, communal waste recycling, building cleaning/lighting, etc
- 7 Delivery of key developments to contribute to a modern interpretation of the 1950's New Town philosophy to meet community needs and help regenerate the Town Centre. Something architecturally above and beyond what is often delivered as the 'bland norm'.
- 8 New public use buildings appropriate to a town of the size proposed (e.g. a new entertainment centre/theatre to replace the long awaited and so far Council failed promise of a reprovided Pavillion)
- 9 Residential street re-design to try to address over-car parking, air pollution, children safety and appropriate space use for various transport modes.

0 Improved footpaths to encourage walking including safer crossings/junction control, enhanced network and replaced failing/poor existing footway surfaces.

When Hemel Hempstead was first built it drew visitors and dignitaries from across the world and became a role model for others. That is no longer the case. Now is the chance for the Council to regain that reputation and become a new role model of best practice for a regenerated and sustainable revitalised 1950's New Town and once again attract city world leaders who want to model our Towns achievements.

**Included files**

**Title** The Housing Strategy

**ID** EGS406

**Person ID** 1260241

**Full Name** BASSIL ASLAM

**Organisation Details**

**Agent ID** 1259009

**Agent Name** Bassil  
Aslam

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** In order to achieve a measured level of new Housing growth in small villages such as Flamstead, we Support the level of new Housing growth that needs to be delivered via Windfall sites ie. 2,408 new homes, as outlined in Table 2. Support is also given to Paragraph 7.17.

**Included files**

**Title** The Housing Strategy

**ID** EGS424

**Person ID** 1260387

**Full Name** Colin Dealey

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Re Tring I don't see any areas within the plan where it can honestly be said that "Affordable " housing will or can be built. Are we to be turned into another soulless city ?
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS457
<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>The Housing Delivery Strategy comment</b>	The Government announced in December 2020 that the methodology used in local processes was being updated. The housing algorithm has therefore changed, prioritising construction in urban areas. This strategy needs to be reviewed frequently to ensure these changes are taken into account before it's too late and our local landscape is changed forever.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS505
<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>The Housing Delivery Strategy comment</b>	Please see attached 2. Piecemeal approach and Use of Urban Land.
<b>Included files</b>	<a href="#">2. Piecemeal approach and use of urban land.docx</a>
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS513
<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>The Housing Delivery Strategy comment</b>	The whole strategy needs to be rethought trough. The number of houses is far in excess of what is required and or is sustainable. The goverment should not be forcing Dacorum to build this number of houses when there is not the space avaiable. Building over green belt is completly wrong and these areas need to remain protected from building.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS531
<b>Person ID</b>	1266576
<b>Full Name</b>	GRAHAM AND JANE KENDALL
<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>The Housing Delivery Strategy comment</b>	<p>I should like to register my objection to the proposals for the Local Plan.</p> <p>Having spent many hours digesting all the relevant information and attending the Teams Meeting of DBC the other night, I am attempting to condense all my feelings and observations into a simple statement. However as this Plan is wrong in so many ways, from unnecessary loss of Green Belt land, to the potential to absolutely swamp the road and social facilities networks, it is far easier to return to the source of the problems, which is the absurd, and poorly assessed numbers that the Government are asking DBC to build in this area.</p> <p>To even entertain the idea of increasing the size of Tring by 50% or putting hundreds of houses along Shootersway, shows a very unhealthy willingness of DBC to try and understand the enormous strength of feeling within the local electorate that exists to halt this Plan. The fact that there has obviously been very little chance of scrutiny while Covid has been upon us, and that very many people did not receive any Council notification, ourselves included, shows a cavalier disregard for the wishes of the local electorate.</p> <p>It is imperative that DBC convince the Govt that the numbers required of Dacorum are totally unrealistic, very poorly arrived at and effectively unworkable. I listened with interest to the Conservative Councillors the other night with their flawed strategy vis-a-vis communication with the Government, but my belief is that they did not really have their heart in fighting for our villages, saving our Green Belt or discharging their duties to the residents that elected them. It was a very poor show indeed.</p> <p>So in very brief summary of the very many reasons that this Plan should be stopped and re-calculated, we urge you to recontact the Government with a view to them revisiting what this area can cope with, and providing further, non-Covid time for a proper consultation to take place. In our view this would include having members of the Government attend meetings in the borough.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS538
<b>Person ID</b>	1260255
<b>Full Name</b>	KTB Commercial
<b>Organisation Details</b>	

<b>Agent ID</b>	1260252
<b>Agent Name</b>	Peter Biggs
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Policy SP4 provides a range of strategies that seek to deliver a minimum of 16,596 net additional homes across the Borough over the period 2020-2038.</p> <p>It is acknowledged that strategy f. of Policy SP4 seeks to bring forward the windfall allowance for small sites not identified in the Plan, which is supported.</p> <p>Strategy g. of Policy SP4 seeks to promote development of small-scale sites within the selected small villages. This therefore indicates that if the village is not “selected” there is a presumption against development. Within the Green Belt, this definition of selected villages would be at odds with the allowed exception of limited infilling in villages stated by exception e) of paragraph 145 of the NPPF 2019. The government guidance does not distinguish between villages. As such, the proposed Policy SP4 is too specific and needs to be broadened to encompass all villages within the Borough, otherwise the Plan is in conflict with guidance contained within the NPPF. This simple fact alone would therefore make the Plan unsound on this basis.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS569
<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>The Housing Delivery Strategy comment</b>	<p>The change in employment patterns and reduction in demand for office space caused by the pandemic will allow the use of brownfield sites to be redeveloped and for commercial buildings to be converted to residential use.</p> <p>It appears that not enough weight has been given in the plan to develop brownfield sites and too much to developing greenfield sites in the green belt.</p> <p>The projected numbers of new houses are too high for the rural nature of Dacorum and its proximity to the Chilterns AONB.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS579
<b>Person ID</b>	1261006
<b>Full Name</b>	Paul Kelly
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The number of houses is too high.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS594
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	Where is the evidence that anyone wants all of these new homes...
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS616
<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> * <b>Yes</b> * <b>No</b>	
<b>The Housing Delivery Strategy comment</b>	<p>The need for more housing is recognised and that some green belt land will probably be required. This should be resisted wherever possible. On another point I have already stated I oppose the alternative proposal of Bulbourne Cross that would effectively connect Berkhamsted to Hemel and result in less construction in Berkhamsted and more in Hemel.</p> <p>I am very conserend regarding the provision for gypsy and traveller sites. I acknowledge the need and ask that the need is provided for while taking account of the Policy for Gypsy and Traveller Sites 2015. I also consider that up to 15 pitches is NOT a small development. Travellers typically have large families but even with an average family of 4 this would represent 60 people. To aid integration I consider small sites of 3 or 4 pitches would be much more beneficial and acceptable.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS623
<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>The Housing Delivery Strategy 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** The Housing Strategy

**ID** EGS686

**Person ID** 1249904

**Full Name** Mrs Christine Ridley

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

**The National Policy** advises:

7.2 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);*
- *determine the **minimum** number of homes needed which is to be informed by a local housing need assessment using the standard method in national planning guidance (paragraph 60);*

The only reference I can find in the documents to the present need for housing in Dacorum is in TRL’s Sustainability Appraisal Report Appendices: (Page 68)

*“In 2016 there were 5,500 people on the Council’s waiting list, with 6.3% of households considered to be overcrowded.”*

These figures are very much out of date. Is the plan basing its figures on such outdated information? A lot of new build has taken place since 2016, so it would be interesting to see the present figures of housing need. However, the provision of 16,900 new homes would seem to be excessive to satisfy local demand.

and at **7.6**: *Irrespective of the final growth figure, the NPPF requires that we fully explore the potential to make effective use of urban land (paragraphs 118 and 137), especially before considering the exceptional circumstances needed for justifying Green Belt releases for housing purposes.*

I have seen no evidence in the Dacorum New Plan that the proposed sprawl over our Green Belt is because of **exceptional circumstances**, nor are the number of houses which are proposed to be built **the minimum** needed for the Dacorum area.

**7.10** *Our evidence tells us that most of the new homes will come forward from urban sites in our main towns and large villages (chiefly over the short to medium term). Most opportunities will arise in Hemel Hempstead as our largest settlement, particularly in and around the town centre and within the Two Waters area. The policies in the Plan will also encourage a strong urban focus to the housing programme and appropriate levels of intensification/densification.*

The above statement is clearly incorrect as well **over half** the proposed new development is planned for Green Belt land.

**Included files**

**Title** The Housing Strategy

**ID** EGS707

**Person ID** 1261251

**Full Name** Lesley Ashden

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** These numbers appear to have been produced by a crude algorithm which does not factor in the geography and green belt constraints of those sites in the Chilterns ANOB and Green Field sites

**Included files**

**Title** The Housing Strategy

<b>ID</b>	EGS725
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	There is no explanation for the growth proposed in Tring which is out of proportion with the rest of the sites in Dacorum/
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS737
<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>The Housing Delivery Strategy comment</b>	I understand the efforts made to comply to the government targets however the delivery of over one third of the new housing on Green Belt land, and even more than a third on greenfield sites is disgraceful from a quality of life and environmental perspective. I cannot see how this area can support such a quantity of new homes and strongly reject the housing strategy to designate so many new builds to greenfield land.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS738
<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>The Housing Delivery Strategy comment</b>	<p>With regards to 7.5: If 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 and to the process of calculating housing need and other matters - Could we be prudent and await the changes before committing financially (taxpayers' money) to the controversial plans with an excessive scale of housing growth in Tring? In a year's time Dacorum would have better clarity of how the Government will stipulate prioritising and numbers of housing needs. Councils in Bucks have decided to wait until there is more clarity. Do we risk wasting finances and resources to commit to this Plan now?</p> <p>A further and important reason for waiting is surely the fact we cannot ignore - we are in a time where our lifestyle habits are rapidly and drastically changing, due to the pandemic. More people are working from home and are able to work at a greater distance from London, putting less pressure on green commuter belt.</p> <p>Furthermore, with the Government's policy to improve the economy and links with the North of England and with the financial commitments of HS2 and the like, already in place, could we concentrate on providing more houses in the North of England, where space is less pressured. If people are working from home and not needing to so frequently commute to London, surely this makes sense at a time like this?</p> <p>With reference to Table 2 (Sources of Housing Land Supply): the number of homes to be built not only extremely high but more than a third of these houses are proposed to be built in greenfield areas; the total in greenfield areas higher than that in urban growth areas. Could we not use disused shops and banks as a brownfield site for smaller dwellings to increase the numbers of houses instead? And could we convert properties into smaller more affordable dwellings in brownfield sites of Tring and also in larger towns nearby that could better cope with the increase in population?</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS755

<b>Person ID</b>	1261254
<b>Full Name</b>	George 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>The Housing Delivery Strategy comment</b>	Whilst recognising this is a nationally imposed over-arching strategy, the number of new houses assigned to Tring over the plan period is totally disproportionate to the size of the existing population and character of the town. In addition, it is clear that no source of funding has been identified for the required infrastructure improvements to support the numbers of homes proposed. The LA5 development currently in progress has delivered no tangible, visible infrastructure improvements for existing residents, only placed further strain on the town.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS770
<b>Person ID</b>	1261262
<b>Full Name</b>	Paul Bayley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	This scale of development in and around Tring is simply not sustainable. The infrastructure is simply not in place in terms of roads, schools, shops and even frequency of trains in to London to support this level of housing development.  This doesn't take in to account building 3000 houses on green belt land is outrageous from an environmental perspective. The carbon footprint of building all these houses is huge. What we have learnt through the recent Covid pandemic is

how important our outside spaces are to our mental and physical wellbeing. Building on them is unacceptable particularly following so soon/at the same time as HS2 and the disastrous environmental implications that that is and will continue to have.

The carbon footprint of building on green belt land is huge not just because of the loss of the land but also all the materials and trucks/machinery which will be used.

The other serious implications will be in flood defences by removing green belt land it will increase the flood risk to all residents of Tring.

Overall building 3000 homes on green belt land will be negative to the lives of all but a minority of residents of Tring. I cannot be more strongly opposed to this level of development in the vicinity of Tring.

**Included files**

**Title** The Housing Strategy

**ID** EGS785

**Person ID** 1261302

**Full Name** Robert Bailey

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment** I object strongly to the proposed release of Green Belt land for housing development. Green Belt was a far-sighted policy that has endured and worked well since the Second World War to protect the rural environment and avoid urban sprawl which has blighted many places such as the USA.

Please do not be responsible for losing this precious protection as a consequence of a perceived housing crisis. There are other solutions particBrownfield development.

**Included files**

**Title** The Housing Strategy

**ID** EGS790

<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>The Housing Delivery Strategy comment</b>	<p>In December 2020 the government made an announcement that covid has changed the way people are living and working and this should be reflected in new housing developments.</p> <p>Rather than now building on outlining parts of the town we should be redeveloping office space and brownfield sites as a priority before further encroachment into our already struggling natural areas. Not only are these sites closer to town centres and transport links (hence requiring less dependence on cars) they are areas that would benefit from improvement in the appearance of the locality</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS794
<b>Person ID</b>	1144729
<b>Full Name</b>	Mr Neil Aitchison
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I write to confirm that I believe the general strategy towards site allocations is now better focussed and although have some reservations on the quantum of development proposed agree with the main areas of adoption at Hemel Hempstead and the south side of Berkhamsted inside the bypass and on the London Road.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS797
<b>Person ID</b>	325639
<b>Full Name</b>	Mrs Virginia Tompkins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Some of the key purposes of the Green Belt are:</p> <ol style="list-style-type: none"> <li>“1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another;</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>I cannot match these key ideas with the large housing incursion into Green Belt land planned to the North and East of Hemel Hempstead which would result in urban sprawl into beautiful farmland and countryside with hedgerows, trees and lots of wildlife. This urban sprawl, already on the edge of two large housing estates (Grovehill and Woodhall Farm) would then join up with a similar sprawl of housing development planned by St Albans right up to Dacorum’s boundary.</p> <p>It would also seem to be contrary to recent Government objectives that new developments should take place in brown field/urban sites in the South of England</p> <p>Also, with climate change we are seeing more extreme weather with increased heavy rainfall in winter months and there has been much evidence of lying water and resurfacing (and flowing) water courses on the fields in the proposed area of development on green belt land to the North of Hemel Hempstead. There is no mention of how the vastly increased water run-off will be dealt with: surely a hugely important environmental issue.</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS806
<b>Person ID</b>	1261340
<b>Full Name</b>	Rupert 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>The Housing Delivery Strategy comment</b>	The plan has been created before the current government's goal for new developments to be on brownfield land rather than greenbelt and as such needs reconsidering to take it into account. The vast majority of proposed Tring housing is not on brownfield land so directly contradicts the government.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS870
<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>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS891
<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>The Housing Delivery Strategy comment</b>	Reliance on 'Berkhamsted and Tring Sustainable Transport Study is an inadequate approach to the challenges which will arise from the increase in dwellings planned for SW and S Berkhamsted.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS928
<b>Person ID</b>	1261540
<b>Full Name</b>	Ms Claire 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>The Housing Delivery Strategy comment</b>	Although the data collected regarding housing needs in the local area is relatively recent (01/04/2020) there has since been the COVID-19 pandemic which has seen the migration of housing demand away from the south east due to the reduced need to be within daily commuter distance to central London, I believe this data needs to be recollected and a new analysis completed to confirm if the housing requirement projection is as it was pre-COVID-19.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS933
<b>Person ID</b>	1261540
<b>Full Name</b>	Ms Claire 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>The Housing Delivery Strategy comment</b>	A post COVID-19 consideration is the need for office space, many companies are reducing the volume of office space required as they introduce a more permanent flexible working environment post COVID-19. As the council plans do not want to reduce the office space offerings within the county the information on empty office space would be welcomed to the consideration as I believe the data will show a reduced demand for office space therefore keeping the current office offerings would leave many buildings vacant that could be utilised as a brownfield site for housing similar to Birmingham City Council has done with the retail space within Grand Central. I am confident mixed-use landlords (commercial, office, retail) would welcome this discussion with the council.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS942
<b>Person ID</b>	1205804
<b>Full Name</b>	Mrs B. 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>The Housing Delivery Strategy comment</b>	Building on greenbelt land does not contribute to protecting the environment
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS984
<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>The Housing Delivery Strategy comment</b>	<p>No one said it would be easy planning for the future at a time of a pandemic which is likely to last two years and change life/work balances, a period when proposals are being made to reform the planning system, the sources of housing need calculation are confusing and there are mixed messages from Ministers, but consistent throughout is the requirements of the NPPF that Green Belt is protected, which is one area where the Government statements are clear. Green Belt boundaries can only be changed in exceptional circumstances. Other than to meet the housing target chosen by the Council, policy SP4 offers no such justification.</p> <p>The reasons why the Council have adopted a housing need of 922 dpa versus the Core Strategy 430 dpa or ONS 2018 assessment of 350dpa despite the constraints that exist in the Borough is not explained but this is compounded by the failure to properly assess opportunities that do exist. Sources of land supply are provided in Table 2. Windfalls are included at 133dpa (total 2,408), whereas the annual average for the last 14 years is 306 and the Council expect 200 pa. (point7.9). Additional windfall homes of between 1200 and 3104 over the course of the Plan can therefore be expected. This reduces the number of homes,5,945, required to be built on the "greenfield Growth Areas"--(Green Belt to most people).</p> <p>A further opportunity and one which would produce sustainable development is rather than safeguarding land area HH02 release it now for development with HH01 in this Plan period which will provide an additional 4,000 homes.</p> <p>Hemel is best placed to capitalise on the benefits of scale development and these opportunities will remove the need to build on the Green Belt round our market towns and villages.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS987
<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>The Housing Delivery Strategy comment</b>	<p>You have used the wrong number. Government is still working on the planning reforms proposed in the recent white paper 2020.</p> <p>You cannot justify going ahead with such draconian changes against all democratic wishes.</p> <p>The second issue is the need for social housing. You can show hardly any social housing compared to the very expensive, second class housing being thrown up at the moment by Taylor Wimpey.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1052
<b>Person ID</b>	1261671
<b>Full Name</b>	Ms Maria Mandry
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

\* Yes  
\* No

**The Housing Delivery Strategy comment**

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). 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. 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.

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

I call for:

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

we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, each new major development area.

- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.
- The Local Plan should allocate land for new allotments for 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. The Local Plan must prioritise this.

**Included files**

**Title** The Housing Strategy

**ID** EGS1054

**Person ID** 1261151

**Full Name** Keith Delderfield

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

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). There is little sustainable about the construction nor preserving of our heritage about this plan.

Every piece of agricultural land that is built on removes that land from food production. This increases transport levels as more food is imported which adds to carbon emissions which is at odds with Dacorum Borough Council declaring a climate emergency and with national governments aims and objectives on climate change.

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.

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

I call for:

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

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

- The Local Plan should allocate land for new allotments for 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. The Local Plan must prioritise this.

**Included files**

**Title** The Housing Strategy

**ID** EGS1094

**Person ID** 1261695

**Full Name** Simon and Claire Nelson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

**We, the undersigned, have the following key concerns and object to the "New Dacorum Local Plan (2020-2038)".**

**1. Out of date and inaccurate data**

The Local Plan is predicated on the Government's data using estimates from the Office of National Statistics (ONS) from 2014. We believe this to be flawed as the data is now outdated and does not take into account recent significant changes. We believe the data to be used should be at least based upon the most recent ONS data from 2018 modified for the significant recent developments, namely, COVID-19 and the UK formally leaving the European Union.

A better option would be for all "new local plans" to be put on hold pending the Government carrying out research into the longer term impacts of the above on housing requirements. Significant impacts are being reported almost on a daily basis and just this week, Capital Economics, a leading independent economic research company, reported that the UK

population may have dropped by as much as 2% in the past year. Clearly this will have a huge impact down the line, not least on housing demand.

## **2.Impact on Green Belt**

The document asserts that a key objective is "minimising and managing the requirement for development on the Green Belt land and the impact of on the Chilterns AONB" How can this be when your document on page 37 states that 5,945 houses from a total of 16,899 will be from the greenfield, some 35%?.

Similar statements "The Countryside.... will be protected from development (page 23) do not resonate. It is clear your plans will create the urbanisation of Great Gaddesden.

## **3.Unsustainable development**

The plan sets out the Hemel Garden Communities development which will create development that is some distance from the existing transport infrastructure and for example over 2 miles from the main railway station in Hemel. There is nothing detailed in the plan that sets out a credible plan for sustainable transport.

## **4.Increased congestion on roads**

With the exception of the new link from North Hemel from the B440 there are no other planned improvements to the existing road network which will clearly increase congestion.

For example the document seems to suggest that traffic coming to and from Berkhamsted will use the new link road in North Hemel to junction 8 on the M1 rather than going through Hemel using the A414. The most direct way that traffic can access this route is directly through Potten End using the unclassified road from the B440 through Potten End along the Common where you then access Berkhamsted through narrow streets. This will have serious impacts on the existing communities and it seems that Hemel's traffic problems are to be exported to Water End, Potten End and Berkhamsted which is unacceptable.

## **Summary**

Our comments have focussed on the key areas of concern. The plan is out of date in that it does not take into account key structural changes that have and will continue to create long term impacts. It is incomplete in that it does not address key transport issues for now and the future and makes contradictory statements with regards to the preservation of the Green Belt. Indeed the Green Belt is sacrificed to the plans!

### **Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1100
<b>Person ID</b>	1149209
<b>Full Name</b>	Mr Robert Scott
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>It is also clear following the coronavirus restrictions that working from home can be effective and provide benefits to both employers and employees alike. There is no doubt that this practice will continue. Hemel Hempstead is very much a commuter town and there will be changes in housing demands as a result of changes to working patterns. Currently the plan for Hemel Hempstead is to focus on small properties such as apartments in high density developments with a very significant volume of affordable housing. This is the main sector that has been increased for many years now and has already resulted in an unbalanced housing stock. Such properties, for many people, provide an early stepping stone before they require family homes or simply want to upgrade, but there is an inadequate stock of such properties in the Hemel Hempstead area. The success and plans for the commercial areas will mean that the demand for larger quality properties will increase. Instead of finding suitable homes in the Hemel Hempstead area, more and more people will be forced to move to other areas including St Albans and Berkhamsted (where property is more expensive).</p> <p>A reasonable balance of housing mix throughout Dacorum is important to support this as well as serving the range of demands. An overemphasis of smaller homes within high density developments in Hemel Hempstead and largely allocating land for quality family homes in and around the other towns and villages will degrade Hemel Hempstead rather than promote it.</p> <p>Please advise how the major changes and implications identified above will be addressed in the development of the plan.</p> <p>May I just clarify that my point is that through the experience of recent major events and changes that I referred to, I believe there should be a significant review of the published Local Plan as far as retail provisions in Hemel Hempstead town and housing is concerned. I am uncertain whether you are confirming that this will be the case or that the original proposal will remain unchanged, envisaging perhaps some more minor changes through the consultation process and future governance. Without specific research and a review being carried out for guidance beforehand it is difficult to see how feedback through general consultation and subsequent consideration can be fully effective towards arriving at the right final plan.</p>

I would appreciate your further advice and information covering the Council's proposals for dealing with this. I understand the pressures that you and your team must be working under with the volume of comments and apologise for adding to this, but I do believe it to be of fundamental importance.

My apologies for continuing to engage on these matters but as you can tell, I consider them extremely important and I really do care about the great area that I live in. I look forward to seeing how the matters will be addressed through the Local Plan implementation processes. I do not necessarily expect a further response from you at this stage but I just wanted to make sure that I have made my points totally clear for due consideration.

**Included files**

**Title** The Housing Strategy

**ID** EGS1101

**Person ID** 1261701

**Full Name** Raeeka Yassaie

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** The numbers sound far too high. The government is using out-of-date 2014 ONS projections. I am not happy it has been calculated appropriately, and we definitely want to avoid a situation where houses are built and there is insufficient demand.

Also, what we need is not more expensive housing on greenbelt areas but more social housing on brown belt areas. Given the environmental crisis we are facing I cannot see how it can be justified that we build that incorrectly calculated, out of date number of homes on greenbelt land. I do not support this proposal.

**Included files**

**Title** The Housing Strategy

**ID** EGS1120

**Person ID** 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>The Housing Delivery Strategy comment</b>	National policy may well lay a duty on local authorities to indentify "developable" areas for development over 5 and 10 years, but this does not mean that it is possible in every local authority to do so without conflicting with its other duties in relation to safeguarding and improving the local environment, both the built and natural environment, and with regard to local areas such as our own AONB.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1147
<b>Person ID</b>	1261804
<b>Full Name</b>	Mr Edward Parkes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>1. Impact on Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC). There must be better alternatives than building housing on 850 hectares of our surrounding green belt.</p> <p>2. Overprovision of housing. Can the council explain why it has used outdated data based on the 2014 based ONS data rather than the more recent 2018 ONS projections?</p>

5. Underestimating potential brownfield regeneration opportunities. Rather than destroy 850 hectares of greenbelt, can the Council confirm that they have explored all brownfield regeneration opportunities?

**Included files**

**Title** The Housing Strategy

**ID** EGS1162

**Person ID** 1261837

**Full Name** Kimberley Bond

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** Far too many houses proposed, on sites which are not suitable either because of underlying infrastructure requirements (drainage, roads, parking) that are not being addressed appropriately, or where the Council is showing significant optimism bias on any highlighted problems, or where the impact on existing residents is not being appropriately considered, particularly when considering their 'lived experience' in large growth areas such as Hemel Hempstead, where the council have stated growth will be 'intensive'.

**Included files**

**Title** The Housing Strategy

**ID** EGS1181

**Person ID** 1261809

**Full Name** Pam Ferguson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	It appears that the starting point for determining the Dacorum housing strategy is to meet the governments minimum housing number from the draft white paper ie the governments 300,000 promised new homes .In the white paper it states that the starting point for a local plan should be the needs of the area . Using the most up to date ONS statistics(2018) would suggest a housing need of half of tha the formula used by Dacorum suggests . The government formula that the council has applied uses outdated 2014 ONS statistics. The council should be challenging this formula . The council should be providing the homes that the most up to date data says is needed especially as it requires such a large release of land from the green belt .The council should be putting forward a robust case to provide fewer houses and protect the green belt in Dacorum .
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1191
<b>Person ID</b>	1261840
<b>Full Name</b>	Rachel Heath
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	Whilst the information aims to convey a considered approach I believe it is at the expense of the environment, enables greedy landowners to profit, is based on erroneous target figures, will still not meet the needs of young people growing into adulthood in the area and trying to rent affordable property or get on the housing ladder and almost completely ignores the changes happening to our society as a result of the pandemic. Post pandemic work practices are changing and people have learnt to love the countryside again. Already paths are ruined and specific locations are too well visited by the huge population of this area. Increased rain will all but wash beauty spots away with the assistance of the increased footfall. Recent years has seen pockets of developemnt supposedly with affordable housing but the reality has not actioned the planning at all as developers can earn more with a different offer of house building. I note the comments about supporting housing for older folk.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1199
<b>Person ID</b>	1261863
<b>Full Name</b>	errol maginley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Tring does not have the infrastructure, foot paths, lighting or road network to sustain the proposed number of new homes
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1205
<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	No
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
--------------	----------------------

<b>ID</b>	EGS1210
<b>Person ID</b>	1142889
<b>Full Name</b>	Dr Peter Chapman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Not only is the use of building on Trings greenfield sites indefensible it is down as making a major contribution (5945) to the Housing Supply..This should be resisted.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1232
<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	No
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1256

<b>Person ID</b>	1253932
<b>Full Name</b>	Gareth Scrivens
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>As referred to by several people making their objections clear, there are serious doubts to the way that the total number of new houses required to be built have been calculated. By your own admission in this document there are "uncertainties over using this as our housing figure". <b>Any proposal of such significance for the Borough should not be made on uncertain estimates or assumptions.</b></p> <p>As you admit yourselves a "further refinement to the process of calculating housing need" is required, and I urge you to do this before progressing any further</p> <p>The national government guidance has been inconsistent in the past 6 months, which is enough reason to re-assess the requirements for housing growth across the borough. 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.</p> <p>Excerpt from Housing Strategy: "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."</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1273
<b>Person ID</b>	1261930
<b>Full Name</b>	Chris Gee
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1325
<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>The Housing Delivery Strategy comment</b>	1870 homes on greenfield and greenbelt land cannot be justified when the population is declining in UK and brownbelt land exists in the centre of towns due to the collapse of retail
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1367
<b>Person ID</b>	398857
<b>Full Name</b>	Mr Paul Tinworth
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I disagree strongly with the Local Plan and the housing numbers proposed. I consider the plans to be excessive in extent and would change the character of the area completely. I can see no justification for this degree of housing expansion in Berkhamsted.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1369
<b>Person ID</b>	1150093
<b>Full Name</b>	Mr Paul 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>The Housing Delivery Strategy comment</b>	I would like to express my disagreement with the local plan and the housing numbers proposed. Please register my response to the consultation.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1378
<b>Person ID</b>	1262050
<b>Full Name</b>	Mr Martin 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>The Housing Delivery Strategy 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, cannot be done without damaging biodiversity. And putting a 10% net gain target on developers that will never be measured or achieved is just greenwash.</li> <li>2. To protect, maintain and enhance water resources (including water quality and quantity) Your own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already over-extracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum. There will be no water left to measure quality. You will kill the river and all the wildlife and biodiversity that depends on it - how are your developers going to offset that in their 10% net gain calculations? Development at the level you propose is simply not compatible with these 2 objectives.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1382
<b>Person ID</b>	1254217
<b>Full Name</b>	Jamie 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>The Housing Delivery Strategy comment</b>	Too many houses

The estimates for housing needs are based on old data. In addition, as a result of the Covid epidemic, working practices are changing. I believe that the housing estimates are unrealistically high.

### **Brownfield Sites**

The plans do not consider sufficiently the current and future potential of brownfield sites and conversion of office and retail premises into housing.

### **Green Belt Impact**

These plans would cause irreparable harm to The Chilterns *Area of Outstanding Natural Beauty* and the Chilterns Beech Woods *Special Area of Conservation* and allow a lot of unnecessary development on the Green Belt.

### **Included files**

**Title** The Housing Strategy

**ID** EGS1393

**Person ID** 1262056

**Full Name** Sue & Graham Holland

### **Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

### **The Housing Delivery Strategy comment**

I write to put forward my strong objections to the proposed Local Plan for Berkhamsted with the construction of 2236 houses in the coming future, particularly those developments planned for Shootersway and Kingshill Way.

My reasons are listed below:-

#### 1. Traffic

The traffic levels along Shootersway and (Address removed) are off the scale now. With school run vehicles and delivery vehicles, people going to work etc., the traffic is nose-to-tail morning and late afternoon. There is only one speed restriction which has little effect, and in our opinion Cross Oak Road should be a limited access road because of its use as a cut through /alternative to Kings Road. With the obvious proximity of Bearroc Park, which is increasing in capacity, traffic will be at maximum levels by the end of the year anyway. The local roads are not designed for high levels of traffic, tarmac regularly breaks down, and the narrowing with no pavements puts pedestrians at risk.

#### 2. Infrastructure

Berkhamsted's facilities are bursting at the seams NOW. Doctors surgeries are over-subscribed and not able to take more patients, schools are full. With the added injection of 2236 new households (potentially 6,500 + people) I fear the town will implode on itself.

3. Preservation of Berkhamsted as an historical town.  
 Berkhamsted is a market town with a lot of history. It needs to remain and retain its identity in the future.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1404
<b>Person ID</b>	1262063
<b>Full Name</b>	TIMOTHY 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>The Housing Delivery Strategy comment</b>	As a resident (Address removed) and having to cope with ridiculous traffic already (often unable to even get out of the drive) I strongly <u>oppose</u> the proposed housing plan for Berkhamsted especially around Kingshill Way, Shooters Way and Chesham Road. The numbers are ridiculous and can only make congestion and quality of life worse for local residents and significantly devalue our properties. With the new housing development in Bearroc Park in Shooters way we have already seen an increase in traffic. The numbers of houses proposed also are significantly above those required by ONS.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1421
<b>Person ID</b>	1262068
<b>Full Name</b>	Ms Emma Starnowska-Reed
<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>The Housing Delivery Strategy comment</b>	<p>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).</p> <p>DBC should challenge the proposed housing numbers – which are dictated by central Government, rather than just accept them.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1439
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy 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 what we currently have and therefore would change the character of our towns which is something extremely important to us who live here. This development will also destroy valuable green belt habitat which in this day in age is outrageous when we are facing a serious climate change disaster and extreme loss in local wildlife already, this will just add to the problems locally and globally.</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1441
<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>The Housing Delivery Strategy comment</b>	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. However on the designs you hsrve sent out there has been no allowed for open spaces which therefore has nothing to help with the fact the air pollution in these areas will dramatically increase. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1445
<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>The Housing Delivery Strategy comment</b>	I'd like to see in a new plan.... <ul style="list-style-type: none"> <li>The number of new houses proposed in the plan to be substantially</li> </ul>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1460
<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>The Housing Delivery Strategy comment</b>	<p>The numbers are wrong/ too high and should be looked at again. There is no logical reason why a calculation based on out of date ONS data should be used.</p> <p>Avoidence of greenbelt land at all costs must be considered. Even if the height of buildings in towns, should be reconsidered. More brownfield sites should be considered before greenbelt land Not enough has been done.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1468
<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>The Housing Delivery Strategy comment</b>	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 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
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1478
<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>The Housing Delivery Strategy comment</b>	I was advised that the plan to redevelop the Hemel Hempstead hospital site included replacement of its existing services in new premises. Just to say that this is more than welcome.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1494
<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

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	The number of net additional homes to be delivered is too high.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1513
<b>Person ID</b>	1262227
<b>Full Name</b>	James White
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Housing Delivery Strategy 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 Dacorum. The Council appears to have 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. Indeed, recent Government guidance on calculating housing need has been, at best, confusing. The algorithm method for calculating housing need which has been used by the Council is <b>not</b> 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. <b>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.</b> I would remind the Council that on Wednesday 16 December the government published its response to the local housing need proposals on the consultation on changes to the current planning system. This sets out important changes to the standard method which has been amended so that the 20 most populated cities and urban centres in England (none of which are in Dacorum) see their need uplifted by 35%. The Government also said:</p> <ul style="list-style-type: none"> <li>• <b><i>"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."</i></b> and they</li> </ul>

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."*

**Included files**

**Title** The Housing Strategy

**ID** EGS1580

**Person ID** 1260507

**Full Name** Michael Burbidge

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

Increasing height and density in the existing towns will change not preserve the character of the of these towns. If you change the type of housing and build so much of it how can you preserve the character? To do that you would have to build more of the same. High density housing can increase the viability of public transport but I see no ambitious plans in this plan. It will create areas of high density housing cut off from public transport and reliant on cars. It would be better to accept that an build to preserve the character of the towns you are planning to expand.

**Included files**

**Title** The Housing Strategy

**ID** EGS1586

**Person ID** 1262289

**Full Name** Mr John Berry

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I have lived in Dacorum for some 30 years and have recently read with interest the draft local plan – I have points I think should be addressed:</p> <ul style="list-style-type: none"> <li>• The plan appears not mention the loss of some 2000 acres of Green Belt and open spaces across the Borough</li> <li>• The plan appears to be based upon 2014 ONS statistics – surely it should be based upon 2018 data which would dramatically reduce the need to build on Green Belt? This is due to the housing need reducing to c.500</li> <li>• The plan can only have a significant detrimental impact on the Chilterns AONB and the potential to upgrade the AONB to a National Park</li> <li>• The COVID pandemic has dramatically impacted the use of office space and brownfield site opportunities - the plan fails to take into account these changes and the potential for more town centre opportunities</li> <li>• The impact on the local road system will be huge and wholly unacceptable. Road use has increased noticeably in recent years – safety of cyclists and pedestrians has been put at risk – these new proposals will just exacerbate the problem. Thousands more vehicles plus delivery vans (on-line shopping drives it) will clog local roads – as a result environmental issues including children’s health will be adversely affected. The idea of a new Mass Transit system will further restrict traffic flow and create major problems in surrounding villages and towns</li> </ul> <p>I believe the plan is incomplete, set against out of date data and creates an unacceptable negative impact on the areas day to day life. I strongly oppose any building on Green Belt – it is just not necessary to provide extra housing within the UK – much more thought needs to be given to brownfield development opportunities.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1587
<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>The Housing Delivery Strategy comment</b>	<b>Policy SP4 Delivering the Housing Strategy</b> BFI supports the proposed Housing Strategy which includes the development of a series of strategic urban extensions on land on the south and western edges of Berkhamsted and up to the A41. This includes a number of small and large developments to the south and south-west which will deliver around 1,870 homes in total.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1631
<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> * Yes * No	No
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1666
<b>Person ID</b>	1262327
<b>Full Name</b>	Michael Mumford
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	There is no evidence that the planned developments meet likely population needs nor relate to infrastructure or employment drivers. They appear to have been derived from arbitrary calculations based on outdated statistics.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1700
<b>Person ID</b>	398895
<b>Full Name</b>	Mrs Sheila Bamforth
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I disagree with the Local Plan and the housing numbers proposed, for Berkhamsted. 1. The housing numbers in the Local Plan across Dacorum, and therefore Berkhamsted are excessive and wrong. They are well above the forecast housing need for the Borough as calculated by the ONS! 2. The impact on West Berkhamsted is disproportionate, does not consider existing and major development in the area (Bearroc) and severely impacts infrastructure (roads, schools etc.), pollution, congestion, road safety, local ecology, health and wellbeing of local residents.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1724
<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>The Housing Delivery Strategy comment</b>	<p>I would like to make some points about the above plan which seems extremely ill thought out. The council appears to want to build thousands of houses on greenbelt land. You are therefore ignoring national planning policy, which states that the greenbelt should not be developed except in exceptional circumstances. You have made no effort to explain what these exceptional circumstances are in this borough. Your proposals are neither justifiable or sustainable and this is the core of my opposition to this draft plan.</p> <p>Your target of 16,596 new homes is an increase of 114% over the 2013 core strategy plan. Please could you revert to the core strategy plan instead. The proposed housing strategy has unjustified housing targets and is exacerbated by flawed handling, which fails to maximise growth in urban areas at the expense of green belt.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1735
<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>The Housing Delivery Strategy comment</b>	<p>Section 10 Delivering Infrastructure to Support Growth.</p> <p>This plan fails to address significant infrastructure issues in a time of climate change, particularly issues of water requirement and waste water. Despite recent heavy rainfall, climate projections are for heavy rainfall in winter but drought in the summer. All these proposed new houses will put pressure on the local aquafer and threaten the local Chalk Streams</p>

. Despite reassurances from local water companies that water will be available, this can only occur with significant expenditure by such bodies to provide the resources such as building new reservoirs , desalination plants and transference systems between other water companies. If these systems are not in place before the houses are built we will run into drought situations with the need for local standpipes in the summer months and our precious chalk streams will disappear.

**Included files**

**Title** The Housing Strategy

**ID** EGS1742

**Person ID** 1262362

**Full Name** Inderjit

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** I strongly disagree, in fact, OBJECT to the local plan and the housing numbers proposed.

**Included files**

**Title** The Housing Strategy

**ID** EGS1746

**Person ID** 1262362

**Full Name** Inderjit

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>The Housing Delivery Strategy comment</b>	The number of houses proposed <u>is excessive</u> and well <u>above the forecast</u> for the borough as calculated by the ONS.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1750
<b>Person ID</b>	211233
<b>Full Name</b>	Mr Andrew Bartley
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Firstly, the lack of provision of suitable homes for a person as myself who is severely affected by disability. Currently DBC does have enough homes in stock available for people with a disability who need suitable family homes. People who have medical need such as an accessible property are being let down in this borough. I know that other councils in Hertfordshire have built two bedroom bungalows since the 1950s, but his council has not. It seems to me the council thinks all disabled people want to live in a flat, this is not so as many people with limited physical ability have a family, I.e. children of their own. I have a friend who is a wheelchair user and married with four children, a family home which is suitable is crucial. My friend doesn't live in this area. I hope DBC plans for suitable homes for people with a disability in it's future development.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1752
<b>Person ID</b>	1262366
<b>Full Name</b>	Isabel 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>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1755
<b>Person ID</b>	1262366
<b>Full Name</b>	Isabel 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>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1759

<b>Person ID</b>	1262366
<b>Full Name</b>	Isabel 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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS1761
<b>Person ID</b>	406469
<b>Full Name</b>	Dr Stephen Douglas
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Housing Berkhamsted. Too many houses along adjacent to A41
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS1772
<b>Person ID</b>	1262373
<b>Full Name</b>	MR JONATHAN KINGSHOTT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I am writing to confirm that I strongly disagree with the proposed housing numbers under Local Plan for Dacorum and in particular Berkhamsted.</p> <p>They are well above the forecast housing needs according to the office of national statistics and will severely impact infrastructures such as roads, schools, trains, car parks, healthcare etc.</p> <p>I sincerely hope that all objections will be taken into consideration in the consultation process.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1779
<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 * No	Yes

<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and aggravated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt; Indeed, the windfall projections appear to use statistics made to fit the result you wanted. It points to serious inability to recognise the need for the allocation, and how the numbers have been calculated, which missed opportunity to avoid Green Belt development at Berkhamsted and Tring.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1782
<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 * No	Yes
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>I support the Council's intention for 40% of new homes on sites of 10 or more homes as 'Affordable' including homes to rent. Previous developments in Berkhamsted indicate this is an extremely difficult target for future developments around Berkhamsted, this makes the Council's strategy questionable as to how this can be achieved.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1805
<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>The Housing Delivery Strategy comment</b>	<p>The housing strategy appears to be not an analysis of future need within the borough balanced with what is feasible without compromising current quality of life. It is more an approach based on the this is what we have been told to build- where do developers want to build?</p> <p>The release of green field sites at this current point in time is not acceptable. As we travel through this pandemic we will encounter unknown shifts in working, shopping, travel patterns. In 12 months our high streets may be 50% empty (I hope not but if very possible) this would open up central areas for redevelopment in prime locations near to transport hubs.</p> <p>What is the point on building on green field sites out of town - the negatives being loss of land, loss of recreational space and increase in traffic. If there will be opportunity to repurpose office and retail space this would be so much more beneficial.</p> <p>The</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1840
<b>Person ID</b>	1144888
<b>Full Name</b>	Mr Christopher Wheeler
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	I understand that the scale of the expansion has been requested by central government, not Dacorum. The scale across the borough is well in excess of the ONS' prediction of the number of new households expected by 2028 and (using

trend) by the closing date of the proposed local plan (2038). The top-down allocation of 'targets' rarely conforms to local realities and that is so on this occasion.

**Included files**

**Title** The Housing Strategy

**ID** EGS1843

**Person ID** 1262473

**Full Name** Mr William Tannett

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** Not convinced that jobs will follow housing, it should be the other way round, and the impact of the pandemic on ways of working is as yet unknown. It has also been reported that there is already a loss of many immigrant EU citizens reducing housing demand.

**Included files**

**Title** The Housing Strategy

**ID** EGS1848

**Person ID** 1262473

**Full Name** Mr William Tannett

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	The plan may or may not be consistent, but the issue is that a top down central Governmental edict is not necessarily up to date nor correct.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1850
<b>Person ID</b>	1262475
<b>Full Name</b>	Mrs Jane 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>The Housing Delivery Strategy comment</b>	I strongly oppose Dacorum's plans for new housing in Tring, which will amount to a totally disproportionate addition to the town's housing stock – in the region of 55% more houses!  This will totally change the nature of the town, put huge pressure on local service and Infrastructure and increase traffic massively.  It will also be an unacceptable incursion into precious Green Belt land.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1853
<b>Person ID</b>	1262477
<b>Full Name</b>	Olivia Trodd
<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>The Housing Delivery Strategy comment</b>	<p>Response to New Dacorum Local Plan (to 2038)</p> <p>I am writing to object to the above plan for the following reasons -</p> <ol style="list-style-type: none"> <li>1 The plan are building too many houses in Berkhamsted where there are a finite amount of job which will then increase the need for commuting. This will impact the local environment, roads and also increase pollution and therefore worsening climate change.</li> <li>2 The houses are being built on green belt areas when there are brownfield sites that could be used instead.</li> <li>3 The sheer scale of the development in Berkhamsted will dramatically alter the town whilst not providing truly affordable housing. There is insufficient infrastructure for these including limited local health services and access to hospitals. There is no significant proposals to improvement to roads and traffic flow when there is always issues with this.</li> <li>4 The number houses was decided before the government changed its strategy and Dacorum have not changed the plans enough to reflect this.</li> <li>5 The countryside will be decimated with these large scale developments. This will affect the local environment and also the local wildlife. The wildlife corridor will be totally insufficient and lead to a decline in local wildlife when we should be prioritising this.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1856
<b>Person ID</b>	1262479
<b>Full Name</b>	Lyndsey Abercromby
<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>The Housing Delivery Strategy comment</b>	I would like to register my objection to the plan as it stands. From what I can see the plan, while well intentioned, is based on what appears to be very questionable data and outdated perspectives on the world. Building on green space should

only take place as a last resort (as stated in the plan), and from the information provided I can not see that this is reflected in the plans put forward. There are local brownfield sites that rumour has it could be developed for housing but these seem caught up in bureaucracy and red tape, priority should be given to developing these areas (e.g. the proposed Lidl site and surrounding land in Northchurch). I see insufficient evidence that the local infrastructure can absorb the additional pressure this number of houses will add, some roads leading to planned developments are only wide enough to allow cars to pass at certain places, these roads will not accommodate an increase in traffic. I also cannot see that any account has been taken to changes in how we live and work that have, and are projected to, occurred as a result of the current pandemic. It is clear this is being considered in other areas, and I believe this should be taken into account here.

**Included files**

**Title** The Housing Strategy

**ID** EGS1858

**Person ID** 1262480

**Full Name** Mr Ian Johnston

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**The Housing Delivery Strategy comment**

I would like to object to the proposals to designate additional sites in Berkhamsted for house building on the following grounds:

1) Berkhamsted has insufficient water to supply additional houses. The Secretary of State for the Environment has designated this an Area Under Severe Water Stress. The River Bulbourne regularly dries up during spells of low rainfall, with a damaging effect upon local wildlife.

2) The Economic Statistics Centre of Excellence recently estimated that the population of the United Kingdom has reduced by 1.3 million since the start of the Covid-19 pandemic, including a 700,000 reduction in the population of London. This must reduce any need to build commuter dormitories in Berkhamsted.

3) An economic recession is an inevitable consequence of lockdown; it could be severe and prolonged. This could significantly reduce the demand for expensive houses. Developers might abandon unprofitable sites in a derelict condition, or unsaleable houses might be constructed and left unoccupied.

In conclusion: I contend that it is impossible in these uncertain times to predict local housing need or demand, but it can be stated with confidence that Berkhamsted does not have enough water to supply additional houses.

**Included files**

**Title** The Housing Strategy

**ID** EGS1863

**Person ID** 1262481

**Full Name** Madeleine Donohue

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

More council housing should be provided. Affordable housing is not really affordable for most people.  
Too many houses are proposed leading to a loss of the character of towns like Berkhamsted and Tring. Inherently small towns that face a large population increase, particularly Tring.  
Too great a loss of green field - 850 hectares. Once lost we will never have again. Post pandemic need to look at brown field sites again.  
Chilterns AONB needs to be sustained. The SAC Chilterns Beechwoods need to be protected. This is too much development in these fragile areas.  
Chalk streams are fragile and rather unique in Britain. Water and waste run off is already a problem which will be exacerbated by a much larger population.

**Included files**

**Title** The Housing Strategy

**ID** EGS1870

**Person ID** 1262495

**Full Name** Jason Nell

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Surely the number of houses have a huge negative impact on sustainable resources.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1882
<b>Person ID</b>	1262512
<b>Full Name</b>	William McCarthy
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I have been informed from a number of sources that the Evidence Base is neither up to date or accurate.</p> <p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p> <p>The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p> <p>Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1888
<b>Person ID</b>	1262518
<b>Full Name</b>	Rachel Kempster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>There are several reasons why I disagree with this strategy.</p> <ol style="list-style-type: none"> <li>1) As previously mentioned, 77% of the new development in Berkhamsted and Northchurch is on Green Belt, destroying 850 hectares of green belt land. In order to justify building on Green Belt, the law states that you are supposed to have 'exceptional circumstances. There are no exceptional circumstances here.</li> <li>2) The algorithm employed to set the housing targets used by central government has been criticised by many as it allows for over building in the south east of the country. The Government responded to this in December saying that 'we should be clear that meeting housing needs is never a reason to cause unacceptable harm to such places (green belt land)' . I feel DBC should go back to central government saying that they cannot meet the housing target without destroying large areas of Green Belt.</li> <li>3) The Council's Core Strategy of 2013 identified multiple reasons why the land they are currently putting forward for development was NOT suitable for development. These reasons still exist eg. encroachment on green belt, inadequate infrastructure, lack of school provision, healthcare etc. Why then have the Council put forward these areas now to meet a housing target which, if the algorithm has been accepted as broken, is not a valid target at all? I feel that they should be questioning this target and saving our towns from overdevelopment.</li> <li>4) The ONS figures for 2018 suggest an annual need for 341 homes in Dacorum. Why then does this plan deliver 609?</li> <li>5) The infrastructure in Berkhamsted cannot support the large volume of new homes planned. The town has already grown in size without improvements in infrastructure. Pollution is unacceptably high in the town centre.</li> <li>6) CPRE Herts have identified that water supply and sewage will be an issue in any development for Berkhamsted. I feel DBC should be considering this.</li> </ol>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1892
<b>Person ID</b>	1262540
<b>Full Name</b>	Bruce Merrett
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I disagree with the local plan and the housing numbers proposed. Shootersway is already subject to too much traffic, often driven at excessive speeds.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1896
<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>The Housing Delivery Strategy comment</b>	<p>We cannot ignore the need for new houses, but this plan is based on figures that the government has withdrawn. As a result most of the south east housing targets were lowered, however the the Dacorum plan provides for increased housing. With significant impact to Green Belt land, that is one of the reason housing targets were lowered.</p> <p>In addition, the current Government has a stated aim of 'levelling up' which is intended to reduce focus on growth in the south / south east and invest more in the north. This plan doesn't fit with that stated strategy.</p> <p>The latest ONS figures for 2018 suggest a significantly lower housing target would be appropriate.</p> <p>The considerable growth in the markets towns of Berkhamsted and Tring far exceeds the ability for those towns to absorb the growth in population and car use. For example Tring High Street is a single road, with very limited parking. The growth of the town is not in line with the infrastructure.</p> <p>Similarly the growth in Berkhamsted. the communities are on the outskirts, not within walking distance of key services and shops so will increase road traffic on roads not designed for the volume of traffic. Congestion is already high and air quality poor. As indicated the report, both Berkhamsted and Tring act as service centres for outlying villages, so car use is already higher than simply measured by existing populations.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1903
<b>Person ID</b>	1262546
<b>Full Name</b>	Alan Needham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>You are planning to build too many houses in Tring on green belt land, this is ill considered and will ruin this small town, as well as damaging the beautiful countryside and the Chiltern area of Outstanding Natural Beauty. In addition the infrastructure to support the proposed increase in local population is just not there and will not be. More brown field sites</p>

should be used and noting the decline in the high street and the empty real estate here then the whole plan needs to be reevaluated.

**Included files**

**Title** The Housing Strategy

**ID** EGS1909

**Person ID** 1262553

**Full Name** Henry Wallis

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, I have serious concerns regarding the sheer scale of proposed development. 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. (See also my earlier comments in section 1.)

I believe that recent Government guidance on calculating housing need has been, at best, confusing. Various bodies have been campaigning locally and nationally against the nonsensical algorithm 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** based DCLG data which would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

**Included files**

**Title** The Housing Strategy

**ID** EGS1943

**Person ID** 1262589

**Full Name** Sarah 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>The Housing Delivery Strategy comment</b>	<p>Section 7</p> <p>I have been informed from a number of sources that the Evidence Base is neither up to date or accurate.</p> <p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p> <p>The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p> <p>Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1958
<b>Person ID</b>	1262618
<b>Full Name</b>	Jasmine 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>The Housing Delivery Strategy comment</b>	<p>Ho will you ensure that you get the required mixture of housing for the elderly, disabled, travellers and large amounts of affordable housing. Will there be any social housing or housing association/not for profit housing which might actually be affordable?</p> <p>Do these figures include the houses/flats being constructed now in Hemel Hempstead and in Roman park Tring?</p> <p>Do we actually need this much extra housing when the population growth has been falling In Dacorum growth was 3.5 % before 2014 but is now less. Likewise population growth in the UK has been declining since 2009 and although it is still growing it is only 0.47% now and will be a lot less in 2038. Also immigration has been the main driver and that is probably falling now</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1966
<b>Person ID</b>	1262690
<b>Full Name</b>	Ruth Sidwell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>Tring Proposals and Sites</p> <p>I am deeply concerned about the number of houses planned to be built in Tring. As well as concerns for the green belt and environmental issues, schools and doctors surgeries, I fear for the extra number of cars that these houses will bring to Tring.</p> <p>Tring High Street is very narrow and traffic flow is often interrupted by parked delivery vans and buses. Feeder roads to the High Street - Western Road, Miswell Lane, Christchurch Road, Dundale Road, Brook Street, Park Road and Station Road are already congested with parked cars (often on the pavements), and traffic does not flow freely.</p>

Will more people use Tring train station? In normal times that car park is full very early in the morning, with no alternative place to park. What provision is in place there?

Siting a supermarket in Brook Street is only going to encourage more cars to drive through the town. It is the wrong place for a supermarket. We have a wonderful local history museum on that site which must not be lost.

Cycle lanes are an excellent idea, but only where there is plenty of space and if they are maintained. What happens to those lanes when space is limited? Such as the High Street, the canal bridge at Tring Station and Brook Street. Pedestrians and cyclists don't mix well!

Development at Roman Park on Icknield Way is well under way. As people move in, I wonder how many will walk into Tring and to sports facilities on the other side of Tring. Where will the children go to school and will they walk? I doubt it.

Please think again. Tring just could not cope with all these extra houses.

**Included files**

**Title** The Housing Strategy

**ID** EGS1971

**Person ID** 1262604

**Full Name** Ray Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	7.1 The numbers are wrong as they appear based on the needs of 2018. Housing etc., in Dacorum is already growing rapidly enough, perhaps too rapidly, to meet the Borough's needs beyond COVID-19 and Brexit. 7.2 There is no evidence of the need to expand housing in Northchurch on the scale proposed.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS1973
<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>The Housing Delivery Strategy comment</b>	<p>DBC are reviewing growth over the next 18 years, this seems a very long time when the NPPF requires DBC planning authority to have 5 years of deliverable sites and an outline plan of developable sites for 6 to 10 years and 11 to 15 if possible. Clearly this is not possible following on so close after Brexit but more importantly in the middle of a pandemic. The pandemic has already caused significant economic retrenchment and deleterious effects on our health and wellbeing, it is not over yet and the future trajectory will not be aligned with the past and therefore planning assumptions will have to change</p> <p>Surely DBC should go for a shorter term plan until the effects of these seismic changes are known. This gives DBC the opportunity to pull back on their Green Belt plans until the way ahead is clearer. It makes no sense to defile a village like Northchurch when the future needs are uncertain</p> <p>The numbers of dwellings planned by DBC are wrong on all levels.</p> <p>In terms of build opportunity, the changing landscapes of town centres will provide many more windfall sites and prevent the planned urban sprawl and village sprawl, Northchurch being a case in point.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS2050
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Again my concerns surround the algorithm used to justify the number of houses required. Why do we need so many additional houses in this commuter belt and is the strategy compatible with the 'evening up' policies of this Government. It seems not
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2071
<b>Person ID</b>	493974
<b>Full Name</b>	Mrs Gillian 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>The Housing Delivery Strategy comment</b>	I disagree with the Local Plan proposals because:  West Berkhamsted is already being developed by major projects (e.g. Phases 1 and 2 at Bearroc Park) with no provision for local facilities including schools, roads, medical requirements, pollution levels and road safety and congestion.

Proposed developments are on Green Belt land, or land designated as open space and this green environment MUST be preserved to prevent Berkhamsted becoming a concrete jungle.

Please protect our town and reject this proposal.

**Included files**

**Title** The Housing Strategy

**ID** EGS2073

**Person ID** 1262743

**Full Name** Roger Hester

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** I totally disagree with the proposal to build such a large number of new houses in Berkhamsted. To do so would dramatically change the character of our delightful, small Market Town. The local infrastructure would be overwhelmed.

**Included files**

**Title** The Housing Strategy

**ID** EGS2083

**Person ID** 1262755

**Full Name** Karen Johnson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	The Housing Delivery Strategy. Far too much housing planned for the market towns based on an outdated matrix which has not kept up with current time and the massive changes that COVID has brought. This over development will destroy the character of the market towns with the market towns being over expanded on the basis that they have train stations and transport links can be improved with buses and cycle lanes which they can't. In a lot of Berkhamsted you can barely get cars up the roads never mind busses as the roads are too narrow. Moving the sports facilities out of the town means people can no longer get to them on foot and will immediately get in cars. The suggestion to move the football ground out of the town is only being made so developers can get their hands on prime development land, in the centre of the town and yet again deprives the residents of a central community activity and hub. The housing strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of green belt. It also fails to take into account post pandemic working practices and the need for more open space and less population density.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2108
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	Not much to say on this other than the how you have arrived at your plan is basically very indecipherable to a layman or woman.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2136

<b>Person ID</b>	1262818
<b>Full Name</b>	MRS SUE COLLYER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>1 New Housing - Your figures suggest a need for new housing. I am not happy to see greenbelt and greenfield sites being used for new housing until every single area of 'brownfield' land has already been utilised. I believe there is much undeveloped brownfield land in Hemel Hempstead which could be utilised before spreading further into the land surrounding the current urban developments. Following Covid, it is expected that Town Centres will experience a change of direction – people will work from home more, many stores and High Street businesses will find new, cheaper ways of trading or, sadly, will cease trading altogether. This will leave many offices and shops empty, offering many new opportunities to revitalise the shopping and business areas with new housing, such as has happened on the Maylands Estate. New houses do not have to be built on green land.</p> <p>I am concerned that all new developments create more pressure and demand on the existing infrastructure, and that despite requirements and prohibitions, water and sewage regulations are continually being flouted by discharge of foul water and sewage into our precious chalkland streams and the aquifers. Please, please please, build into your plan an insistence on accountability – by the builders, the developers, water, gas, electricity – all services for a greener delivery of your planned project.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2141
<b>Person ID</b>	399537
<b>Full Name</b>	Mr David Featherstone

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>The Dacorum draft Local Plan presented for consultation is unsound and should be discarded in its entirety. It encourages excessive development in the Borough that is not justified in the light of the UK Government’s stated policy of promoting such growth principally in economically deprived areas of the country. Further, the plan cannot be sustained by the Borough’s existing services and transport infrastructures, and it fails to make suitable and sufficient proposals concerning how this might be rectified. It is abundantly clear that, if implemented, the plan’s developments will result in irreversible loss of Green Belt land and irreparable harm not only to Dacorum’s towns, villages and countryside but also to its adjacent areas of national beauty and environmental significance. I align myself with the views expressed by the Campaign for the Preservation of Rural England Hertfordshire on these and other matters pertaining to the plan, which are quoted below. See also my closing comment following this quote.</p> <p>“1. Unnecessary impact on Green belt, the Chilterns Area of</p> <p>1 a) One third of the countryside area in Dacorum Borough is within the Chilterns AONB. This is a designated protected landscape of national importance, which the Borough Council has a legal duty to protect and enhance. As well as ensuring the protection of the AONB area itself, the</p> <p>Borough Council must also ensure the protection of the setting of the AONB. This is the land outside the boundaries of the AONB where inappropriate development could impact on the special qualities of the AONB, due to its visual intrusion but also due to noise, vehicle traffic and pollution.</p> <p><u>Discussion:</u> In 2019 the Glover Report, commissioned by the government’s Department for Environment, Food and Rural Affairs (DEFRA), recommended that the Chilterns AONB should become England’s next National Park. The land area involved might be expected to include areas recommended by the Chilterns Conservation Board to be included within the AONB boundary. The requested boundary review was submitted to Natural England in 2013 but is still pending.</p> <p>There is no mention of the Glover Report’s recommendation in the Dacorum Emerging Strategy for Growth (the Strategy). The Strategy proposes that substantial areas of the Green Belt around Hemel Hempstead, Berkhamsted and Tring alongside the AONB boundary should be allocated for housing.</p> <p>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>

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:

‘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.’

- 1 b) The proposed plan has been published before completion of a screening exercise to establish the impact of the proposed developments on the Chilterns Beechwoods Special Area for Conservation.

Discussion: The Chilterns Beechwoods Special Area for Conservation (SAC) is a site of European importance for biodiversity and wildlife conservation. Following the UK’s departure from the European Union the legislation remains within UK law. DBC is the designated Competent Authority responsible for ensuring that no harm is done to the SAC as a result of any development proposals. Much of the area comprises the National Trust’s Ashridge Estate, a popular leisure and recreation destination.

Dacorum Borough Council is required to apply the Habitats Regulations Assessment (HRA) process to this area, the first stage of which is a Screening exercise which defines whether any proposals contained in the Dacorum Emerging Strategy for Growth (the Strategy) are considered likely to have any adverse effects on the SAC.

At the time of publishing the Strategy Dacorum Borough Council was in the process of engaging consultants to carry out this Screening.

The housing numbers proposed in the Strategy are such that the increase in population of the Dacorum Borough area would undoubtedly put even greater pressure on the SAC area, which is already suffering damage to its environment due to traffic and car parking, and wear and tear on paths and tracks.

It is irresponsible of Dacorum Borough Council to publish this Strategy without first carrying out the Screening exercise.

The Habitats Regulations Assessment (HRA) process decides whether any local plan or development proposal will impact on an SAC. The first stage of this is the Screening. If the Screening reveals the potential for impacts, the Competent Authority must carry out an Appropriate Assessment (AA). It is important to note that the Screening must not take into account or assess any potential mitigation – this arises from recent case law (the People Over Wind judgement).

The Strategy suggests that certain conclusions have already been reached regarding this process prior to the Screening being undertaken. This includes proposals for compensatory measures and for offsite mitigation set out in Policy DM31. There is a danger that including these in the Strategy at this stage will influence the Screening process.

- 1 a) The proposed local plan prioritizes meeting an excessive level of housing need over protection of the Green Belt on the assumption that this is required by national policy This assumption is incorrect. Exceptional circumstances for meeting housing need in full have to be shown, and have not been demonstrated in the consultation documents.

Discussion: Dacorum Borough Council acknowledges that Dacorum is a largely rural area (page 19 of the consultation document) and that 85% of Dacorum is rural, 60% is Green Belt, and 33% "of the countryside is within the Chilterns Area of Outstanding Natural Beauty". It also states that a key objective of the plan is "minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB."

This objective is then dismissed by a statement in paragraphs 19.5 and 19.6 that destruction of the Green Belt is permitted in exceptional circumstances, and that these exceptional circumstances are the need to meet their calculation of housing needs in full.

This statement is incorrect in that the existence of need alone does not meet the exceptional circumstances test, as stated tested in legal cases which clarify that there are a number of factors that councils must consider before exceptional circumstances are determined. The National Planning Policy Framework (NPPF) specifically states (paragraph 11b) that Sustainable Development for local plans means, amongst other criteria, meeting housing needs 'unless policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development', listing Green Belt, AONB's and SAC's amongst such 'areas or assets' in footnote 6.

Dacorum Borough Council has failed to follow this national planning policy to take these areas, such as the loss of Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB), into account when proposing the number of houses that should be built.

- 1 a) While using the 2014 based household projections to calculate housing need follows government guidelines it fails to take account of the National Planning Policy Framework which expects local authorities to use the latest available information. 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.

Discussion: The proposed plan makes a number of statements that are misleading and unjustified on housing numbers. They would result in an unsound basis for the scale of future development in the plan, and thus an unsound basis for the removal of land from the Green Belt for such development.

The trends revealed by the latest Office for National Statistics (ONS) 2018-based Population and Household Projections are towards a very significantly lower increase in population and number of households to be catered for than that estimated by the Council's consultants, GL Hearn in their updated South West Herts Local Housing Need Assessment (SWHLHNA) 2020, the Council's main evidence document on housing need.

Using the 2018-based household projections and a proposed new national method to calculate need, the Plan calculated an annual additional housing need figure of 922. The latest government guidance still using the old 2014-based projections would result in an even bigger figure of 1,022 a year.

By contrast, using the 2018-based household projections alone produces an annual household need figure of 341. Allowing for a 3% vacancy rate, and for potential past under-provision, CPRE Hertfordshire believes a realistic and sound estimate of Dacorum's annual housing need over the plan period is in the range of 351 to 536 dwellings per annum. The Council should assess housing numbers for the next stage of the Plan that properly reflect actual observed recent trends in the local population and number of households, rather than slavishly rely on an inappropriate national algorithm that would result in an unsound Plan.

- 1 b) 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.

Discussion: Dacorum Borough Council is proposing to release 746 hectares from the Green Belt for development. This is in addition to 80 hectares of Green Belt released for development via the 2013 Core Strategy for housebuilding that has yet to occur on four sites which are also included in this new proposed Plan: West Hemel, Marchmont Farm, Old Town Hemel, and Hanburys at Berkhamsted. Plus, there are another 23 hectares of other greenfield sites proposed for development, mostly urban infill building on green spaces within towns. Grand total of countryside and green spaces lost if this Plan goes ahead: 850 hectares. That is a massive amount of land, with accompanying loss of biodiversity.

In terms of proposed housing numbers, it's 9,995 on land currently in the Green Belt, plus 1,665 on the four ex-Green Belt sites noted above, plus 379 on other greenfield sites, for a total of 12,039 new houses on Green Belt and greenfield combined. This is out of the minimum total proposed figure of 16,596 / 922 dwellings per annum (dpa). See Appendix for further details.

Discussion: To meet legal obligations in the NPPF and the 2004 Planning Act Section 19 (1a), Local Plans need to demonstrate how emissions for the area will be radically reduced in line with carbon budgets – a carbon reduction pathway specific to the area. Local Plans also need to effectively show how these carbon budgets will be regularly and effectively monitored. The Royal Town Planning Institute (RTPI) recently communicated this requirement to all planning authorities. The plan as proposed by DBC fails to address these requirements.

Climate Change Committee (CCC) 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.

ClientEarth has put local authorities across England on notice, warning them that they will violate their legal obligations and risk legal challenge if they do not introduce proper climate change plans. Local Plans need 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.

The proposed plan has clearly prioritized economic growth over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various bodies on how carbon reduction plans have to be integral to the development of local plans.

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.

Discussion: 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 school places (children in some year groups are currently having to be placed outside

their locality); insufficient capacity of the local healthcare system with the nearest acute care in Watford, Buckinghamshire or Bedfordshire.

“5. Water supply and wastewater.

a) 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).

Discussion: Paragraph 174 of the NPPF states that plans should promote the conservation, restoration and enhancement of priority habitats, and paragraph 175 states that where significant harm to biodiversity cannot be avoided then planning permission should be refused. The NPPF Glossary states that priority habitats are those habitats included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006 (s 41 sites). Chalk rivers are included in the section 41 list.

The 2010 Water Cycle Study (part of the evidence base for the Strategy, produced for five Hertfordshire LPAs including Dacorum), was based on two growth scenarios presented by the emerging Regional Spatial Strategy. For Dacorum Scenario 1 was 9,000 new homes in the plan period 2006-31, and Scenario 2 was 17,000 new homes

(680 dwellings a year for 25 years). The Study concluded that Scenario 1 (across the Study area) would not allow any water surplus past 2030, while Scenario 2 would require additional imports of water from 2024 during critical periods.

- 1 b) The proposed increase in housing will require substantial investment in infrastructure in order to transport and treat wastewater and sewage. The proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion.

Discussion: The Adopted Core Strategy 2006-2031 for Dacorum Borough states that ‘developers should ensure that there is sufficient capacity at the relevant wastewater treatment works. It also states: ‘The most pressing (infrastructure) issue is that of sewage treatment infrastructure, which will need significant upgrades to serve the development proposed in the wider area, including that in Dacorum.’ The current proposals make no mention of the specific need for sewerage infrastructure improvements (para 10.4 on page 49), although Policy SP7 sets out the mechanism for delivering infrastructure which places responsibility for funding with developers. Policy DM35 (on page 126) states that development which would cause a significant increase in water pollution (among other effects) will not be permitted. The 2010 Water Cycle Study sets out a long list of wastewater treatment and sewerage issues across the five Local Planning Authority areas which needed to be addressed to accommodate the growth levels proposed at the time. It states (on page 4): ‘a number of potential growth locations are located to the opposite side of existing settlements with regards to the Waste water Treatment Works (WwTW) or trunk sewers. Any network upgrades required through the existing settlement will be expensive and disruptive, and may therefore be cost prohibitive, particularly if funded by developers.’

The above situation applies to housing proposals on the northern edge of Hemel Hempstead. The town’s wastewater currently goes to the Maple Lodge WwTW. The Water Cycle Study states that the Maple Lodge WwTW (or Blackbirds

WwTW, dependant on TWU strategy) will require substantial upgrades under both growth Scenarios. Limited space at Maple Lodge WwTW may make this problematic. Higher wastewater flows also have potential impacts on water quality, including downstream of WwTWs, including during storm events which are expected to increase in severity due to climate change. Such upgrades would be disruptive, expensive and require three to five years to plan, design and construct.

It is not explained in the current Dacorum documents whether any of these issues have already been addressed by infrastructure improvements.

- 1 a) 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.

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

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

“7. Over reliance on aspirational growth strategies and partnerships which have not been subject to public consultation and scrutiny.

- 1 a) The proposed local plan is based on selective strategy documents that have no formal planning status and which have not been widely consulted on. As a result, the plan does not adequately address important issues such as the climate emergency, the environmental impact of the proposed developments and the prioritisation of brownfield sites to meet housing needs.

Discussion: The Plan is explicitly based on three corporate strategy documents

(Dacorum Growth and Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025, and a Corporate Action Plan) as explained in section 3 on page 21. These documents have no ‘Planning’ status, appear to have only been selectively consulted on if at all, and should not have been used to pre-judge the proposed plan’s strategy or content, which should instead have emerged from the public consultation process. Also, it is not made clear in the documents how the proposed plan reflects the results of the last, “Issues and Options Consultation”, in 2017.

The strategy documents appear to be internally generated within the Borough Council based on the aspirations of councillors and other unelected external organisations with vested interests such as the Hertfordshire Local Enterprise Partnership (HLEP) and other business interests. The Council seems to be using these to pre-judge the direction and scope of the emerging local plan. The plan is missing context from external bodies with a legitimate interest in the Borough such as those with an environmental focus.

“8. Implications of withdrawal of St Albans submitted Local Plan

The proposed local plan does not consider the impact of the withdrawal of the St Albans Local Plan

Discussion: 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 (5500dw) in Dacorum must be called into question if there is any doubt on the future viability of the Garden Community project as a whole. “

I believe the foregoing arguments demonstrate conclusively that the draft plan as presented is not fit for purpose and should be set aside. Any new plan must properly consider all of the points noted in these comments.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS2149

**Person ID**

399537

**Full Name**

Mr David Featherstone

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

The proposed local plan prioritizes meeting an excessive level of housing need over protection of the Green Belt on the assumption that this is required by national policy This assumption is incorrect. Exceptional circumstances for meeting housing need in full have to be shown, and have not been demonstrated in the consultation documents.

Discussion: Dacorum Borough Council acknowledges that Dacorum is a largely rural area (page 19 of the consultation document) and that 85% of Dacorum is rural, 60% is Green Belt, and 33% "of the countryside is within the Chilterns Area

of Outstanding Natural Beauty". It also states that a key objective of the plan is "minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB."

This objective is then dismissed by a statement in paragraphs 19.5 and 19.6 that destruction of the Green Belt is permitted in exceptional circumstances, and that these exceptional circumstances are the need to meet their calculation of housing needs in full.

This statement is incorrect in that the existence of need alone does not meet the exceptional circumstances test, as stated tested in legal cases which clarify that there are a number of factors that councils must consider before exceptional circumstances are determined. The National Planning Policy Framework (NPPF) specifically states (paragraph 11b) that Sustainable Development for local plans means, amongst other criteria, meeting housing needs 'unless policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development', listing Green Belt, AONB's and SAC's amongst such 'areas or assets' in footnote 6.

Dacorum Borough Council has failed to follow this national planning policy to take these areas, such as the loss of Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB), into account when proposing the number of houses that should be built.

**Included files**

**Title** The Housing Strategy

**ID** EGS2190

**Person ID** 1262765

**Full Name** Paul Rees

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment** The plan to Deliver the Housing Strategy is wrong-headed and needs to be dramatically amended. Given the scale of the climate and ecological emergency, the number of new homes envisaged for Dacorum needs to be halved. If the number of new homes remains the same then Dacorum will knowingly be adding to the climate and ecological emergency, which in itself is unacceptable, but Dacorum would be doing this in the year of COP26, when decision makers across the UK must show courage and demonstrate leadership at this critical moment in human history.

**Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2198
<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>The Housing Delivery Strategy comment</b>	I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, unjustified housing target and made worse by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. It also fails to take into account changes in working practices in a post COVID world.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2221
<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>The Housing Delivery Strategy comment</b>	Given Dacorum says it wants to promote sustainability and protect biodiversity it must change its housing delivery strategy forthwith. The number of envisaged new homes must be halved and sustainability and biodiversity must be prioritised.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2250
<b>Person ID</b>	1262907
<b>Full Name</b>	David Beaumont
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I write with specific regard to Berkhamsted.</p> <p>The planned 2,000+ homes is a huge increase and would make a major change to the nature of the town. I might support such an intention if I could be sure that it is warranted and that the properties would indeed include substantial 'affordable' housing.</p> <p>Is the proposal warranted? There appears to be some disagreement over the calculation of just how many properties are needed.</p> <p>'Affordable' housing? Irrespective of the lack of agreement on the meaning of 'affordable', evidence suggests that developers always argue for a reduction in affordable units and almost invariably get their way.</p> <p>I cannot support this proposal as it stands.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2263
<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	Yes
<b>The Housing Delivery Strategy comment</b>	The calculation of housing needs is flawed, and that was before the impacts of Covid on the housing market. By all means build affordable housing, to ensure all local people have good quality housing, there is no need to build on this scale, it will not reduce the cost of housing for local people.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2284
<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>The Housing Delivery Strategy comment</b>	BRAG believes DBC's housing strategy as outlined in this consultation can be summarised with the simple statement: <i>We have accepted a huge target now where do we build? Step forward developers – take the reins.</i> Paragraphs 7.6, 7.9 and Table 2 are confusing when comes to windfalls. Both 7.6 and 7.9 state that 200 homes pa have been used but Table 2 only shows 2,408 in total which equates to 133.8dpa. Paragraph 7.9 states “ <i>Our analysis indicates that windfall sites will play an important part in the housing programme (at 200 homes pa). They are made up of a wide range of small to large sites from a variety of sources that have been calculated using historic delivery rates and expected future trends. We believe it is justified based on past local evidence and is a reliable source of supply across the Plan period.</i> ”

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

DBC clearly have a different view of "*expected future trends*" than most other observers, including Government, who expect increased windfall urban development as working practices change post the current Covid-19 pandemic and change of use applications increase.

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

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

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

Maybe a table of our own will illustrate the importance of this point and how it affects the amount of Green Belt release required to meet the 'non-target' of 922dpa.

Currently there are two parcels of Green Belt in North Hemel, HH01 and HH02 with a total capacity of 5500 homes due to be released now, but 4000 of these homes held for future development.

Based on the last 14-year windfall average, the requirement to build 2538 homes in the Green Belt could be accommodated comfortably in HH01/02 in this Plan period.

If the more conservative view taken by the Council of a windfall average of 200dpa is used, the Green Belt homes requirement of 4450 can also be accommodated in HH01/02.

The net effect is that DBC could achieve its target of 922dpa by releasing all of HH01 and HH02 now with the added benefit to Hemel that only this scale of development can bring and remove from the Plan the need to develop on Green Belt elsewhere in the Borough - a housing strategy that fully aligns with the current Core Strategy settlement hierarchy which was ratified by the planning Inspector in 2013.

Of course, BRAG does not accept the 922dpa as a legitimate target, but the exercise still clearly illustrates that that even if 922dpa were required it is almost certain that true windfall calculations would reduce the need for Green Belt release by well over 50% - and the table does not account for increased change of use windfalls that is accepted by Government as likely to be a trend going forward, indeed the final column (Last 5yr Ave) suggests the trend for Dacorum is already increasing.

Good planning plans for the right homes in the right places. This is an ill-conceived housing strategy driven by a flawed target and settlement hierarchy that is doing the opposite.

BRAG takes issue with point j of Policy SP4 “*The development of a series of strategic urban extensions on land on the south and western edges of Berkhamsted and up to the A41. These will chiefly be made up of a number of small and large developments to the south and south-west which will deliver around 1,870 homes in total, including land for new primary and secondary schools, and other facilities.*”

BRAG has explained elsewhere why these are not sustainable locations and will not enhance the quality of life for residents current or future. They are not the right homes in the right places, and most importantly for this section they are not required if DBC takes a more measured analysis of the numbers along with adopting a more logical housing strategy that concentrates on urban/brownfield sites and more sustainable locations.

With this in mind, BRAG also questions point l of Policy SP4 “*5,500 homes at the strategic urban extension of North Hemel, comprising of 1,500 homes in the Plan period at North Hemel Growth Area (Phase 1) and 4,000 homes beyond 2038 at North Hemel Growth Area (Phase 2). The later phase will be removed from the Green Belt and safeguarded to meet longer term housing needs.*”

Although BRAG doesn’t believe the numbers alone provide the exceptional circumstances required for Green Belt release, the matching of infrastructure and development would appear to be only achievable with large concentrated developments such as a new town or very large site rather than through much smaller ad hoc developments/sites.

BRAG doubts DBC’s ability to deliver the utopia vision of the Garden Communities along with rejuvenation of Hemel Hempstead, but we acknowledge that Central Government has already bought into this cross-boundary initiative with substantial grants, so BRAG doesn’t understand why the bulk of the homes to be built in Dacorum should be deferred until after 2038. They should be bought forward rather than changing Green belt boundaries in less sustainable locations like South Berkhamsted.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2307
<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
* <b>Yes</b>	
* <b>No</b>	

<b>The Housing Delivery Strategy comment</b>	The council need to explain exactly how these numbers have been arrived at . Because I would suggest right now they are not believable .They do not take into account changes particularly since Brexit and the pandemic .Without the fundamental assumptions being clearly communicated and explained. Borough residents especially those in Berkhamsted and Tring will believe that their communities are being sacrificed for no good reason .
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2349
<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>The Housing Delivery Strategy comment</b>	<p>The focus on numbers imposed by central government forgets para 11 and 60. Retrospective assessment as suggested by para 61 needs a strategic assessment of change going forward which requires definition. The demonstration of deliverable sites is not possible if planning permission is not granted for those sites yet; it is based on a contradiction. Large developments seem to take far longer than 5 years to start delivering houses, perhaps DBC should include smaller developments in their plans and not put target spots on the map to see what transpires.</p> <p>Reliable source of supply (para 71) should not to be based on wheeler dealer developers in private consultations with land owners or planners.</p> <p>As far as assessing Gypsy and Traveller site needs is concerned ORS themselves said the use of historic evidence to make an assessment of future need is not recommended. This would seem to hold true for housing need in general.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2354
<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>The Housing Delivery Strategy comment</b>	Nobody I know in Hemel accepts the so called "need" assumed in your Plan for the massive increase in housing it proposes, causing gross increases in HH's urban sprawl with unwarranted Green Belt devastation. The directives and assumptions behind this vast expansion are now false. BREXIT means we've left the EU, hundreds of thousands of EU residents are returning to their home countries, and our new points-based immigration system will drastically reduce future immigration. Combine this with our own aging population, far lower population growth and new housing need is now a certainty.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2355
<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>The Housing Delivery Strategy comment</b>	The housing figures needed is wrong and needs to be completely recalculated.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2371
<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>The Housing Delivery Strategy comment</b>	I do not understand why the number of houses required has risen do much since the last review, but I believe that your forecasts are not based on the latest data available in terms of housing needs. This needs to be addressed otherwise the whole plan is flawed.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2400
<b>Person ID</b>	1263014
<b>Full Name</b>	Christopher Cass
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	As the prison service have played big brother and stopped residents using the area around the prison as a way to the village, that a lot of us have been doing for over 20 years. I would like to ask that any development on the Chesham Road Molyneaux Avenue site would include a footpath from the bottom end of Lancaster Drive to Hythe Lane at the mini

roundabout. Also consideration be given for a crossing near the roundabout as the pavements are very narrow and there will be an increase in children coming from this area.

**Included files**

**Title** The Housing Strategy

**ID** EGS2408

**Person ID** 1227518

**Full Name** Mr John LOWRIE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** It seems odd to me that you are asking people to comment on the delivery plans when the infrastructure strategy has not been completed yet. How can we comment on traffic flows created by 5,000 extra homes when the studies into the effects have yet to be published. How can ask for CIL to be spent on Water End bridge bypass if the facts are not there to support any claims for or against

**Included files**

**Title** The Housing Strategy

**ID** EGS2451

**Person ID** 1263028

**Full Name** jennifer summerfield

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>The Housing Delivery Strategy comment</b>	Please ensure that any 'larger' development sites are landscaped sympathetically and they are aesthetically pleasing to both residents and neighbours.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2472
<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>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2486
<b>Person ID</b>	1263087
<b>Full Name</b>	Alan Kondys
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

**The Housing Delivery Strategy 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**

**Title** The Housing Strategy

**ID** EGS2500

**Person ID** 1263101

**Full Name** Richard Hall

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	SP4. The Plan is based on a very worst case that will open up far too much greenfield to development at lower densities (if less housing is needed). This could then derail future housing needs and provide less affordable housing.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2505
<b>Person ID</b>	1263100
<b>Full Name</b>	Leah Kelly
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Tring is within the Chilterns Area of Outstanding Natural Beauty. This title is gained by the unique, irreplaceable, and fragile countryside and wildlife located here; the houses in contrast will destroy habitats and fields, and tarnish the AONB title. Furthermore, by building the massive 2,731 houses sandwiching the quaint market town, this small town buzz with an extensive amount of history that I personally have grown up with and is what many love about Tring is soon to be changed forever into something unrecognisable. The vast amount of houses will also seep into and take over small villages like Bulbourn, completely changing the geography of the area and causing these small villages to be overwhelmed and engulfed. In 2011 the number of houses in Tring was just 2,199; while that figure may have differed in the last 10 years, the new proposed development will easily double the current number of houses in the town resulting in an overwhelming demand on local facilities, roads, and on the community as a whole.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2523
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy 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. The plan is wholly disproportionate in terms of growth for Tring and Berkhamsted. Surely there can be no justification in building sufficient new houses in Tring solely to allow for another secondary school.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2542
<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>The Housing Delivery Strategy comment</b>	The strategy needs to include a focus on urban areas over green belt where possible. Basic. The vision, hierarchy, fixation on "target" means that this strategy is fundamentally wrong
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2553
<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>The Housing Delivery Strategy comment</b>	From what I understand, the number of homes required to built figure is incorrect, meaning this entire section is flawed.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2570
<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>The Housing Delivery Strategy comment</b>	The figures as have been calculated for future growth as previously mentioned need stronger challenging and justification. A strategy should be put together to avoid green belt building and current infrastructure and nature of Berkhamsted is not aligned to the growth strategy put forward
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2593
<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>The Housing Delivery Strategy comment</b>	<p>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).</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2714
<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 * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>When approving developments do not take money from Houae Construction firms. Instead, insist on the development of amenities, social centres and green spaces as part of the development. Too often the Council take the money and do not reinvest.</p> <p>When approving house design, take into account that most houses have two cars. So require off-street parking for two cars. In addition, if you look at Beroc Park, the houses look fine until you park a car on the drive when it becomes very</p>

clear that they have been build to a scaled-down version of what you would expect when looking at them from a distance. I've seen houses where a car can not fit in the bgarage and, if squeezed in, the driver could get out of the car.

SP4 1c - if we have learnt anything from thr post-war housing development it must be that people do not want to live in high-rise tower blocks. Limit the 'height' element of future building to 6 floor. This is about as high any anyone wants to live and reduces the impact on the town-scape.

**Included files**

**Title** The Housing Strategy

**ID** EGS2717

**Person ID** 1263247

**Full Name** Giselle Okin

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment** I believe the plans are based on outdated ONS data and latest numbers show that the need is not as great for housing as suggested in this plan. either way, the extra housing level planned in Berkhamsted is excessive for the infrastructure especially when existing and newly finished housing is added to the numbers as we are only just starting to experience the additional pressure on the infrastructure that these have put on the town. The plans need to be reconsidered in light of a plan that's more sympathetic to the town and its size, shape, geography and structural limitations.

**Included files**

**Title** The Housing Strategy

**ID** EGS2723

**Person ID** 1263253

**Full Name** Todd Bowmaker

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I feel that the volume of houses planned, particularly for Tring, has been ill thought out and will severely impact the way of life in the town. As it is, the high street struggles with the current volume of traffic, the bus service is woefully inadequate, and the car parking at the station is massively below required levels, being completely full before 9am every day. The use of green belt land to develop the proposed houses is shortsighted and will take away from what is one of the key attributes of our town.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2729
<b>Person ID</b>	1263248
<b>Full Name</b>	Johnjo McDermott
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	There are too many houses proposed for Tring on floodplains and green belt sites without adequate drainage, schools or health facilities for the numbers of people. Some one is getting paid handsomely and local residents will suffer and not see many tangible benefits.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2733
<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>The Housing Delivery Strategy comment</b>	<p>As stated in previous sections and please refer back for evidence, but I strongly object to the scale of the housing developments across Dacorum, the excessive housing figure based on out-of-date data that does not adequately reflect the current population decline, the broad-brush classification of peripheral settlement areas as 'urban' in defiance of public perception and the development of high-rise blocks in Hemel Hempstead and particularly Two Waters. The latter will make the town centre less inviting to live and shop in.</p> <p>Given the increasing uncertainties about the basis of your housing figure, the consultation should be suspended and re-presented when all new refinements and updated baseline data are available.</p> <p>In addition, I have been unable to find any endorsement from the County Council or local school Headteachers that all the proposed new schools will be needed, particularly the two new secondary schools at Berkhamsted and Tring. An alternative would be to increase capacity through new block or higher classroom build at Ashlyns and/or Tring, or create one new sixth form school at Tring to take the older children from Tring and the West of Berkhamsted /Northchurch /Dudswell.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2746
<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>The Housing Delivery Strategy comment</b>	Housing does need to be provided but not at the expense of the green belt.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2763
<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	Yes
<b>The Housing Delivery Strategy comment</b>	I do not believe the the housing delivery strategy fully considers the negative impact this will have on the market towns and their ability to sustain the extra population. I also believe demand for housing from people leaving London will dramatically change post Covid and therefore this plan overestimates the demand and will therefore cause financial losses to the current inhabitants.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2785
<b>Person ID</b>	1263104
<b>Full Name</b>	charlotte grange
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>The Housing Delivery Strategy comment</b>	I am glad that, according to 7.6, the council are attempting to maximise use of brownfield land. I however do not see the need for the 16,900 houses during the next 18 yr period - this is truly unsustainable and not in accordance with projected population growth from the ONS.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2799
<b>Person ID</b>	1207011
<b>Full Name</b>	Mr Neil Aitchison
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I write to confirm that I believe the general strategy towards site allocations is now better focussed and although have some reservations on the quantum of development proposed agree with the main areas of adoption at Hemel Hempstead and the south side of Berkhamsted inside the bypass and on the London Road.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2811
<b>Person ID</b>	1262479
<b>Full Name</b>	Lyndsey Abercromby
<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>The Housing Delivery Strategy comment</b>	I would like to register my objection to the plan as it stands. From what I can see the plan, while well intentioned, is based on what appears to be very questionable data and outdated perspectives on the world. Building on green space should only take place as a last resort (as stated in the plan), and from the information provided I can not see that this is reflected in the plans put forward. There are local brownfield sites that rumour has it could be developed for housing but these seem caught up in bureaucracy and red tape, priority should be given to developing these areas (e.g. the proposed Lidl site and surrounding land in Northchurch). I see insufficient evidence that the local infrastructure can absorb the additional pressure this number of houses will add, some roads leading to planned developments are only wide enough to allow cars to pass at certain places, these roads will not accommodate an increase in traffic. I also cannot see that any account has been taken to changes in how we live and work that have, and are projected to, occurred as a result of the current pandemic. It is clear this is being considered in other areas, and I believe this should be taken into account here.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2814
<b>Person ID</b>	223046
<b>Full Name</b>	Mr Roger Petts
<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>The Housing Delivery Strategy comment</b>	I am writing to object strongly to the proposal of building more houses in Berkhamsted as part of the Local Plan. A large number of houses have recently been built including a significant number on Bearroc Park. This has caused a range of difficulties and any further building will have an even greater impact on infrastructure, congestion, pollution, and the general well-being and health of local residents.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS2854
<b>Person ID</b>	1144499
<b>Full Name</b>	Mr Robert Emberson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>Location &amp; number of houses</b></p> <p>We are entering a post Covid-19 world and the context of the present consultation is quite different to that obtaining at the 2017 consultation. Hundreds of Department Stores have closed their doors permanently along with other retailers &amp; many others will follow when current subsidies are removed. As a result tens of thousands of square metres of retail space will have to be repurposed either by conversion or rebuilding. In addition many people now work at home for part or all of the week, freeing up substantial amounts of office space. This has resulted in considerable amounts of city centre retail &amp; office space now being available for conversion to housing.</p> <p>A recent CPRE report found that Local Authority brownfield registers have enough land for 1.3 million new homes with half a million of these already having planning permission. There is therefore enough suitable land already in the planning system to meet the government's ambition of building 300,000 homes per year. The government's latest response (December 2020) to its White Paper on changes to the current planning system of August 2020 makes quite clear in the light of public concern for the protection of the countryside, that the Standard Method for calculating how many houses to plan for, is merely a starting point and that meeting housing need is never a reason to cause unacceptable harm to protected landscapes and Green Belt. It does not override other planning policies including the protection in Paragraph 11b of the National Planning Policy Framework or our strong protections for the Green Belt.</p> <p>In the light of these concerns &amp; the greatly increased availability of commercial land in cities &amp; towns referred to above the Government is uplifting the Standard Method by 35% for the most populated cities &amp; urban centres. In view of this new situation it cannot now be reasonably held that <i>exceptional circumstances</i> exist for the release of the Green Belt land surrounding Tring as specified in paragraph 136 of the NPPF.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS2869
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2896
<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> * <b>Yes</b> * <b>No</b>	Yes

<b>The Housing Delivery Strategy comment</b>	<p>I think the figures are too high for the whole area. Berkhamsted and Tring should not be "larger scale Growth Areas".</p> <p>Based on ONS projections, 500 new homes a year, on average, rather than 1,000 would be a more appropriate building target.</p> <p>We must ensure that there are affordable new homes, particularly in Berkhamsted as housing that has been build recently has ended up being high value = £750k which doesn't provide a good mix of diversity.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2913
<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>The Housing Delivery Strategy comment</b>	<p>Concentrating on the town centre for development seems logical and it would benefit from the regeneration especially as the high street is struggling and many shops are likely to close with the use of online shopping. The provision of new schools is also vital.</p> <p>It is important to keep development to a minimum in the villages to preserve their character.</p> <p>Will some of the accomodation be designed for the increasing elderly population, for example bungalows, retirement villages etc.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2914
<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>The Housing Delivery Strategy comment</b>	The Housing Delivery Strategy is fundamentally flawed by dint of using an outdated and inflated housing target.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2948
<b>Person ID</b>	1263445
<b>Full Name</b>	Andrew Farrow
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I am extremely concerned that a plan which will result in the irretrevable loss of 2,000 acres of Green Belt land appears to be based on Government policy which has changed twice in six months and is now at odds with its own explicit statements committing to the protection of the Green Belt. This is not the basis on which such long term decisions should be taken.</p> <p>Although the Plan includes some brownfield site development, the major housing developments are on the outskirts of Hemel, Berkhamsted and Tring. The Plan fails to take into account the likely impact of the coronavirus pandemic and recent changes to planning which may free up more sites in town centres.</p> <p><u>Anything which reduces the potential impact on the Green Belt should be explored exhaustively.</u></p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS2951
<b>Person ID</b>	1263438
<b>Full Name</b>	Angelika Goff
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I don't know if this is quite the right section to provide this comment - as I have to say for a novice this whole process and the way the local plan is laid out for commenting is quite confusing - but anyway:</p> <p>I do not understand how any government body can come to the conclusion that &gt;16k new houses are required for Dacorum in 2020-2038. This equates to &gt;900/year when the latest ONS projections state 355 homes are needed per year.</p> <p>Where is the huge discrepancy coming from? I would fully support a local plan broadly in line with ONS projections, and would also accept that this might require (limited and sustainable) development on green belt land. However I can NOT support a local plan based on such hugely inflated housing numbers without any real evidence behind these numbers, and I do expect Dacorum to push back on these 'requirements' in the strongest terms.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2959
<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	Yes

* No	
<b>The Housing Delivery Strategy comment</b>	<i>We know that the timescale is quite lengthy before the building work for schools would take place and if this could be shortened then this would be advantageous so that families are not rushing for a school place. It will also give schools sufficient time to implement the provision as well as recruit the staffing.</i>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2963
<b>Person ID</b>	1263460
<b>Full Name</b>	Suzanne Harding
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Having read through the Dacorum Draft Local Plan I am incredibly concerned about the following points which do not seem to have been addressed either at all or adequately in the proposal:</p> <ul style="list-style-type: none"> <li>- what the exceptional circumstances are that the council believes necessitate the development of green belt (greenfield) land as it is obliged to prove under national planning policy</li> <li>-any growth strategy for Berkhamsted which means all houses could potentially be for people who would need to work out of town</li> <li>- how impact on traffic, schools, local amenities, water and wastewater would be managed which is crucial</li> <li>- consideration of climate change or sustainability</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2964
<b>Person ID</b>	1263465
<b>Full Name</b>	CHARLY PRESTON

<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>The Housing Delivery Strategy comment</b>	<p>I have benefited from living in beautiful Berkhamsted for 18 years, my whole life in fact. I wish for my views to be recorded regarding the proposals contained within the "Emerging Strategy for Growth (2020-2038)".</p> <p>I wish to register a <b>very strong objection</b> to the choice of several of the development sites that are contained within the Plan. Noting I live in Berkhamsted, the prime objection is to the proposed developments within the Berkhamsted area. My objection is based upon three fundamental strategic grounds outlined below:</p> <p><b>Incorrect Assumptions for Housing Provision.</b> Accepting the fundamental need for more housing, in particular, genuinely affordable housing, I have major concerns regarding the enormous scale of proposed development of Dacorum, impacting the Green Belt. It is my understanding that 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.</p> <p><b>Impact on Green Belt and Other Designated Land.</b> 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.</p> <p><b>Failure to Provide Adequate Supportive Infrastructure.</b> Specifically, I look at the proposed developments on Green Belt land around Berkhamsted and state categorically that there is not enough consideration in the Plan for the provision of new or of upgrading the current infrastructure to support the scale of the proposed developments. Berkhamsted is already a Town which is at capacity in terms of schooling, road services, water supply and wastewater disposal.</p> <p>I request that my objection is fully taken into account.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS2966
<b>Person ID</b>	1263471
<b>Full Name</b>	HELEN GILLETT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I have benefited from living in beautiful Berkhamsted for almost 20 years. I have always taken great interest in the development of the town and particularly how it has grown to meet the housing needs within the borough. I wish for my views to be recorded regarding the proposals contained within the "Emerging Strategy for Growth (2020-2038)".</p> <p>I wish to register a <b>very strong objection</b> to the choice of several of the development sites that are contained within the Plan. Noting I live in Berkhamsted, the prime objection is to the proposed developments within the Berkhamsted area. My objection is based upon three fundamental strategic grounds outlined below:</p> <p><b>Incorrect Assumptions for Housing Provision.</b> Accepting the fundamental need for more housing, in particular, genuinely affordable housing, I have major 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 undoubtedly be aware that on Wednesday 16 December 2020 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 is in Dacorum) see their need uplifted by 35%. The Government also said:</p> <p>"More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a <b>risk to protected landscapes and Green Belt</b>. We (Government) should be clear that meeting housing need is never a reason to cause unacceptable harm to such places." They went on to say "Within the current planning</p>

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".

**Failure to Provide Adequate Supportive Infrastructure.** Specifically, I look at the proposed developments on Green Belt land around Berkhamsted and state categorically that there is insufficient consideration in the Plan for the provision of new or of upgrading the current infrastructure to support the scale of the proposed developments. Berkhamsted is already a Town which is at capacity in terms of schooling, road services, water supply and wastewater disposal.

I request that my objection is fully taken into account. You will undoubtedly see many more similar objections from other residents of Berkhamsted that the proposed developments within the town are wrongly premised, should not take place on Green Belt land and do not make proper provision for improved infrastructure for the town to accommodate such large developments.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2982
<b>Person ID</b>	1263476
<b>Full Name</b>	mr John Scafe
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I am replying to the Emerging Strategy for Growth Consultation</p> <p>The total of 2,731 houses is huge and will swamp the market town of Tring. It is not clear as whether the present building on LA5 Western Road is included, I fear not. What about Doctors Surgeries? The present surgery has had to take on half the population of Berkhamsted.</p> <p>In particular I object to the fact that we would lose the peace and pleasure of Marshcroft Lane. This is the only country lane on our doorstep and it is used by many walkers, cyclists, dog walkers, rambles -dayly. We are so lucky to have this lovely lane, where we locals can escape for a relaxing walk which can lead to the canal towpath or to Aldbury Nowers or Pitstone Hill for those who are rather fitter.</p> <p>If development must take place, the preference is the area between Cow Lane and Tesco.</p> <p>There was a proposal to develop land off the Icknield Way, opposite the end of New Road, which would be a much better option. Why is that not mentioned?</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS2987
<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>The Housing Delivery Strategy comment</b>	Housing delivery: the ambition to create 40% affordable housing is laudable but probably unrealistic given local property prices.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3017
<b>Person ID</b>	1263485
<b>Full Name</b>	MR ANDREW 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>The Housing Delivery Strategy comment</b>	<p>I wish to object strongly regarding the housing developments in our area of Northchurch.</p> <p>Any new houses in New Road will cause massive traffic issues at the junction with the High Street. This is also 'Green belt' land and should not be developed.</p> <p>More housing in the Darrs Lane area will again cause massive congestion and again Green Belt land is being sacrificed.</p> <p>We do not have the schools, doctors surgeries and shop parking areas to accommodate more and more housing.</p> <p>This is just not the correct location for these new houses. I object most strongly to these plans.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3025
<b>Person ID</b>	1263489
<b>Full Name</b>	Malcom & Jennifer Stodell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>It seems paradoxical and unacceptable that the local public is being asked to comment on Dacorum's Local Plan with it's longterm and far reaching consequences, at a time when central government has now radically moved it's stance on housing targets geographically. I would suggest Dacorum needs to reconsider some of it's key decisions in view of this and at that time consult it's electorate.</p> <p>One of the Government's tickets for re-election was to rebalance the south east : north divide. It seems clear that to focus large numbers of new houses in the already overdeveloped south goes against this premise.</p> <p>The Local Plan further aggravates this situation for various reasons :</p> <ol style="list-style-type: none"> <li>1. I feel greater consideration should be given to brownfield development. I suspect a number of these sites have already been given planning permission but are being land banked.</li> <li>2. If the above was pursued the call on Green Belt land immediately adjacent to our beautiful Chilterns AONB could be avoided or at least be very significantly reduced.</li> <li>3. No consideration has been given in The Plan as to how, in the aftermath of the pandemic, town centres and offices will be used very differently.</li> <li>4. The proposed road plans are flawed for various reasons.</li> <li>5. Despite lip service to the Green Agenda it is very likely the large Hemel Hempstead development will significantly increase car usage locally.</li> <li>6. Many have concerns that there is already an over extraction of water from our chalk aquifer . Clearly with a large increase in local residents this will be exacerbated. There will also be increased run off of surface water when our green fields are concreted over. In the recent wet winters we are very regularly seeing this is significant problem.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3026
<b>Person ID</b>	1263490
<b>Full Name</b>	KESSIAH 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>The Housing Delivery Strategy 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).  As a resident, I would like the DBC to reconsider this plan which imposes an over development on a huge area of green land which thousands take great enjoyment from. 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. I am concerned that historic data has been used for the calculation of provision of housing. 2014 data is 7 years old and a lot has changed since then so would be useful to have a more reflective set of data.  3 Failure to address climate concern issues. The proposed plan does not meet legal obligations to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy.  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 Brownfield regeneration. The government allows commercial and office space to be converted to residential without need for planning permission. This new opportunity appears to have been overlooked in the proposed plans and is likely a better use of already existing buildings or space.</p> <p>Appreciate the time taken to review the above points and am looking forward to hearing how these will be addressed.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3043
<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
* Yes	
* No	

<b>The Housing Delivery Strategy comment</b>	<p>1 I object to the housing numbers that have been proposed in this consultation. The government must be challenged on the numbers put</p> <p>Why are outdate ONS figures of 730 dwellings being used, when applying the algorithm increases it to 1023 dwellings per year?</p> <p>Clearly these are out of date figures. The latest ONS projections for Dacorum is 355 houses per year. Applying the algorithm to this latest number, this would suggest that the maximum figure for our housing target should be 497 dwellings a year.</p> <p>This inflated target is in large part responsible for the huge amount of Green Belt that is put forward to be released for housing as part of this Local Plan and will provide an overprovision of housing in the area. The current proposed plan promotes building nearly 17,000 new homes within our borough of which 60% is Green Belt, meaning the houses will be built right up to the boundaries of the Chilterns AOB. This will have significant impact on the special biodiversity we have in Dacorum.</p> <p>The Council has failed to take account of the National Planning Policy Framework, paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constrains including the impacts on the Green Belt and AONB.</p> <p>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>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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3046
<b>Person ID</b>	1146084
<b>Full Name</b>	Mr Jason Parr
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	Affordable Housing Affordability is ill defined in the plan. If it is proposed that the current government guidance of 80% of market value is used, the majority of local people working in the borough are ruled out of being able to purchase a house.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3078
<b>Person ID</b>	1263505
<b>Full Name</b>	Mrs Sonia Ong
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I am writing to inform you of dismay and unrest regarding the planning proposed for Tring the town I live in. I wish my anti proposed planning comment to be logged as what is being proposed is simply despicable.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3086
<b>Person ID</b>	1263457
<b>Full Name</b>	Matthew Deane
<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>The Housing Delivery Strategy comment</b>	The proposed development of Tring, will dramatically change the nature of the Town and this is not treated with any level of empathy to the existing residents or understanding of the impact on quality of life. The plans do not recognise or make any commitments to the big changes that would need to be implemented to cope with such a large number of homes and maintain / improve the quality of life for residents. Years of infilling and small scale development have led to issues around car parking at the station, car parking in the conversation area, car parking for the museum, car parking for Tring Park, maintenance of roads , provision of proper cycle ways , provision for electric car charging etc.provision of recycling facilities etc. In addition there are limited commitments to how affordable the homes would be and what additional amenities would be provided to prevent further congestion in the High Street
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3099
<b>Person ID</b>	1263510
<b>Full Name</b>	CAROL HAYES
<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>The Housing Delivery Strategy comment</b>	I wish to register my objection to the proposed development outlined in Dacorum Borough Council's document entitled "Emerging Strategy for Growth (2020 – 2038). As a resident of Berkhamsted, please reconsider this plan which imposes massive over development on an already stretched 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). 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 do hope you will reconsider these actions which will lead to the destruction of our beautiful town and surrounding areas. Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily. The following are some of my 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.

**Included files**

**Title** The Housing Strategy

**ID** EGS3131

**Person ID** 1263515

**Full Name** Irene Petts

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** I strongly disagree with the Local Plan and the housing numbers proposed.

**Included files**

**Title** The Housing Strategy

**ID** EGS3154

**Person ID** 1263498

**Full Name** Peter Reynolds

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The number of net additional homes to be delivered is too high and a reduced number should be accommodated as discussed in previous points.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3156
<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>The Housing Delivery Strategy comment</b>	The calculation of windfall sites seems pessimistic and underestimates the amount of land that will could be allocated to the growth over the coming years. To revisit these calculatiosn would release a little of the pressure on the greenbelt land. As previously mentioned the 'target figures' are not justified and nor is the release of greenbelt land to service these figures. We are also coming (hopefully) to the end of a pandemic that will inevitably change the working landscape and thus we need to flex with this.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3199
<b>Person ID</b>	1263567

<b>Full Name</b>	Malcolm and Linda Cooper
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I write in response to the public consultation in progress and relating to the proposals outlined in the brochure and on line by DBC for housing development in the Towns of Tring Berkhamsted and Northchurch.</p> <p>My initial thoughts are that the calculations are <i>WRONG</i> and the numbers of required dwellings have been manipulated by the government algorithms to increase from 355 to over 1000 per year from 2021 to 2038. This alarming unjustified enhancement will undoubtedly impact on Green Belt land and ANOB. The planned development sites show this to be fact and those that don't fall in this category are destined to be shrouded in pollution from the A41 traffic.</p> <p>My wife and I live in Northchurch, a parish within its own right and supporting its own Parish Council. DBC have opted to refer to us as West Berkhamsted and as such, little if any thought has been given to the huge unsustainable impact it will have to bear. There is just one road connecting Tring with Berkhamsted and that is very narrow at points, totally unsuitable to cope with the vast increase of traffic should these proposal sites be approved.</p> <p>The infrastructure improvements outlined in the proposal do not go anywhere near far enough. The station car parks at both Tring and Berkhamsted are full to capacity with commuter traffic every working day. The Doctors and Dentists are overstretched and the Hospitals seemingly unable to cope. Shop parking is sparse and where will the water come from. One good summer and bans are imposed.</p> <p>Your proposals will permanently change our delightful market towns into urban sprawls that are not sustainable and the loss of Green Belt is irresponsible. Wildlife through loss of habitat will suffer and once gone can never be replaced. This is unthinkable and absolutely not what we want for future generations.</p> <p>Let us not overlook that reportedly there are 600 000 EMPTY properties in England and innumerable brownfield sites. Concreting over fields is totally unnecessary. They must be preserved for our future.</p> <p>I would encourage a response.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3215
<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>The Housing Delivery Strategy comment</b>	based on a target which is far too high
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3230
<b>Person ID</b>	1144598
<b>Full Name</b>	Mr Julian Dent
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>Housing numbers</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3253
<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>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3260
<b>Person ID</b>	1145069
<b>Full Name</b>	LYNN 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>The Housing Delivery Strategy comment</b>	<p>I am emailing you to express my objection to the proposed development outlined in Dacorum Borough Council’s document “Emerging Strategy for Growth (2020 – 2038). I am emailing because it takes far too long to read and complete your documents</p> <p>As a resident, I urge DBC to reconsider this plan, which proposes massive over development on an already stressed environment with severe implications for the integrity of the Green Belt and our status as an AONB (you will be aware that the 2019 Glover report recommended that the Chilterns should be awarded National Park Status). Our countryside is precious and finite and it is therefore crucial that irreplaceable land is not lost to unwarranted development.</p> <p>My principal objections:</p> <p>1 The proposed plan will lead to overdevelopment of protected green belt land, the Chilterns AONB and the Chilterns Beechwoods Special Area of Conservation. The Council has a legal duty to protect the AONB and its environs.</p> <p>2 Potential over-provision of housing. The council has used old data to calculate future housing needs. The most recent official government projections, from 2018, indicate a housing need that is around half of that currently proposed in the plan. The consequence of using the older 2014 ONS data, is that 850 hectares (the equivalent of approx. 1,214 football pitches) of precious Hertfordshire Green Belt land, countryside, and urban green space will be destroyed to build 16,596 new homes.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3263
<b>Person ID</b>	1145069
<b>Full Name</b>	LYNN 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>The Housing Delivery Strategy comment</b>	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 opportunity appears to have been ignored in the preparation of the proposed plan.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3276
<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>The Housing Delivery Strategy 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 and keeping our natural heritage.</p> <p>The developments intended for Berkhamsted along the A41 these areas were designed as nature corridors when the A41 was built. The building on these sites will have a negative impact for the wildlife in this area.</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>Affordability is ill defined in the plan. If it is proposed that the current government guidance of 80% of market value is used, the majority of local people working in the borough are ruled out of being able to purchase a house.</p> <p>Genuinely affordable should mean the rent or level of mortgage repayment is no more than a third of the household income, this must be calculated on the income of workers in Dacorum, not London, where average salaries are higher.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3349
<b>Person ID</b>	1161417
<b>Full Name</b>	James Pitt

<b>Organisation Details</b>	Gleeson Developments Limited
<b>Agent ID</b>	1161419
<b>Agent Name</b>	Kevin Coleman
<b>Agent Organisation</b>	Director Phase 2 Planning & Development Ltd
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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,</p>

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**

The Housing Strategy

**ID**

EGS3362

<b>Person ID</b>	1263693
<b>Full Name</b>	Ruth Colderwood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I feel too much green areas and countryside is being used. There is not sufficient infrastructure to manage the additional cars that will be trying to leave Berkhamsted along Shootersway. It will increase the amount of pollution.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3390
<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>The Housing Delivery Strategy comment</b>	No Comment
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3400

<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3430
<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>The Housing Delivery Strategy comment</b>	<b>Housing Numbers</b> I reiterate my comment in answer to Q3 that overall numbers are handed down from government, but given that the now projected 1023 (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, 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."*

This plan appears to prioritise Growth over environmental considerations in an effort to meet the unsupportable numbers issued by government.

*"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"*

There is no justification provided for the huge numbers of dwellings proposed for Berkhamsted and Tring other than "we have to put them somewhere" nor is there any consideration of the needs of the towns nor of its potential detrimental impact on the towns.

How is a 24% increase in the size of Berkhamsted with no additional employment provision, justified or sustainable ?

*"can make an allowance for windfall sites as part of anticipated supply, where there is compelling evidence that they will provide a reliable source of supply (paragraph 71)"*

The windfall allowance of 200 pa across the Borough is risible, given the current levels of windfall, and that 2 current applications in Berkhamsted will provide almost half of that figure and almost half the total figure of 217 (IDP) for Berkhamsted across the plan period.

*7.6 Irrespective of the final growth figure, the NPPF requires that we fully explore the potential to make effective use of urban land (paragraphs 118 and 137), especially before considering the exceptional circumstances needed for justifying Green Belt releases for housing purposes.*

Exceptional Circumstance for the Release of Greenbelt must be *"fully evidenced and justified"*– no such evidence or justification is provided. Again release of Greenbelt is proposed simply to accommodate housing numbers which the government has said many times is not a valid reason , as in this statement from 16th Dec 2020 in relation to to protected landscapes and Greenbelt *"We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places."*

Whilst the long term effects of Covid are difficult to assess, it would seem inevitable that High street properties will become available for residential development, particularly with recent changes to the rules on permitted development and change of use, and at least some attempt should be made to build in an allowance for these, before the Reg 19 plan is produced

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3475
<b>Person ID</b>	1263804

<b>Full Name</b>	Vicky Hewlett
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I have so many concerns about the level and location of proposed development. We live in an outstanding area of natural beauty and I believe our greenbelt land should be protected for future generations. I wholeheartedly oppose any development on greenbelt and believe that brownfield sites should be where development is made.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3477
<b>Person ID</b>	1262625
<b>Full Name</b>	Katie Guest
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>It is completely confusing for me to understand why a council who say they are against loss of Green Belt Land have presented a proposal which includes a huge loss of Green Belt Land!</p> <p>If there is nowhere else to build to meet the numbers other than Green Belt land then we have to challenge the numbers. I understand that they are overstated anyway, so we have to push back. The Green Belt cannot be sacrificed! We need it for human health as well as for health of the environment and wildlife. Let's see what numbers can be reasonably built on brownfield sites and use that as the path forward, while at the same time reviewing the latest population growth numbers given a declining childbirth rate and impact of Brexit. And make the plan much more realistic and palatable to residents of Dacorum.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3490
<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>The Housing Delivery Strategy comment</b>	<p><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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3498
<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>The Housing Delivery Strategy comment</b>	The removal of farmland within the surrounding areas of the market towns should be kept at a minimum
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3532
<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>The Housing Delivery Strategy comment</b>	Too many additional houses are proposed.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3549
<b>Person ID</b>	1263834
<b>Full Name</b>	Michael Illes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I am extremely sceptical about any of the affordable housing comments especially after Breroc Park where the cheapest property in teh affordable housing section of the development is valued in excess of £500K? WWho sets thee limits, what is affordable and to whom?
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3558
<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>The Housing Delivery Strategy comment</b>	TRPC 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
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3576
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS3593
<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>The Housing Delivery Strategy comment</b>	Desecration of the countryside - a dastardly plan to concrete over acres of green belt land to satisfy Tory ideology.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3612
<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>The Housing Delivery Strategy comment</b>	<p>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.</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>	The Housing Strategy
<b>ID</b>	EGS3670
<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>The Housing Delivery Strategy comment</b>	Stay off the greenbelt!
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3685
<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>The Housing Delivery Strategy comment</b>	<p>Table 2 [P37] shows 5945 houses being built on 'Strategic greenfield Growth Areas' viz Green Belt of which around 1870 are allocated to Berkhamsted. These cannot be considered 'sustainable sites'; the further critical issue is whether it is desirable to impose 20% plus growth on a small market town that already has severe infrastructure limitations as well as being constrained by proximity to AONB, Beechwood SAC etc</p> <p>The council have failed to take account of NPPF , para 11, footnote 6 which allows local authorities to restrict the scale of development owing to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Housing need should be based on the most recent and relevant data , which is currently the 2018 based ONS projection, not the 2014 ONS data which the council is basing its calculations on. This is no longer relevant and even less so post pandemic when people need to work/live in different ways.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3689
<b>Person ID</b>	1263930
<b>Full Name</b>	Lucy, Jonathan and Ruby Curtis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I would like to oppose all development plans for Berkhamsted and NorthChurch areas.</p> <p>We are experiencing a climate emergency.</p> <p>Destroying our green areas in further contributing to this. Instead our council should be focused on creating more green areas and planting trees to help Dacorum in the contribution to Net Zero Carbon lifestyle.</p> <p>I cant understand how our high street and surrounding schools would cope with the traffic, volume of people and impact on the environment by having not one bit TWO new developments either end of Berkhamsted High Street.</p> <p>There is NO NEED for more housing. There is a need for more green areas and caring for wildlife and greenbelt areas more than ever at this time of a climate emergency!</p> <p>Please take this as my absolute opposition to these planning permissions and I speak for all residents of St Margaret's Close in Berkhamsted. 30 households of families who want to save our green belt areas and make a stand against these developments.</p> <p>Like everyone else in Northchurch and Berkhamsted we love our rural setting and our village and want to keep it the way it is</p> <ul style="list-style-type: none"> <li>— The over all number of houses proposed - 16,899 across the borough — is just not justified by the latest statistics on projected population growth</li> <li>— massive development in Tring and Berkhamsted will cause gridlock in Northchurch High St as well as the 400 houses earmarked for Northchurch itself</li> <li>— The grounds for encroaching on the Green Belt have not been made out - the law says we can only build on the Green Belt if it has proven to be necessary - this is simply not the case!</li> <li>— Insufficient value has been put on the Green Belt both in terms our mental and physical wellbeing and the impact on climate change</li> </ul> <p>We are asking the council to consider the future generations who will suffer because of the constant destruction of green areas. Climate crisis is real, we hope that Dacorum will act responsibly when making future decisions and help our borough become a net zero community.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3695
<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>The Housing Delivery Strategy comment</b>	Outdated, houses not needed and destroying the green belt is not the right way to do it
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3705
<b>Person ID</b>	1263937
<b>Full Name</b>	Marion MacGillivray
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	I have lived at Northchurch, Berkhamsted, Herts. for more than 8 years. One of the attractions of living here is the wonderful view I have over Nothchurch Common. I am very concerned that the Plan will have a damaging effect on that view and on the Green Belt generally in this area. 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. 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.

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 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. 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. We have particular concerns regarding the impact on water supply and waste water disposal. The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030. The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

The Emerging Strategy for Growth appears to be based on 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.

I am also concerned that the possibility of a link road through our delightful close is again being considered. This would completely destroy its charms and make it a rat run.

I do hope you take my concerns into account and change the proposed Plan accordingly.

**Included files**

**Title** The Housing Strategy

**ID** EGS3716

**Person ID** 1263921

**Full Name** sarah diehl

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	They are planning to build large homes which will not be affordable and the infrastructure will not be able to cope. There will be a shortage of school places and local GP surgeries are already at capacity. The local roads at peak times are already very congested.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3764
<b>Person ID</b>	1260970
<b>Full Name</b>	Mrs Edie Marchant
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I have lived in Tring for many years and it is an understatement to say that I am appalled by Dacorum Borough Council's proposed scale of development in and around the town. To increase the number of houses by 55% is totally beyond any reasonable or sustainable level of development in view of all the pressure on existing facilities that such an influx of new residents will bring or, furthermore, that 3,000 houses will be build on green-belt land. Facilities, such as car parking to mention a minor issue, are already over-stretched by recent in-filling development in the town.</p> <p>On both counts - of over-development and the destruction of green-belt land in an area of outstanding natural beauty - I strongly condemn this plan.</p> <p>What is to become of England's "green and pleasant land"? It will have no meaning at all here if this level of development is allowed to proceed.</p>

Surely the point of building HS2 (which I also deplore on every economic, developmental and environmental ground that I can think of) is to "rebalance" the economy and, if that is the case and construction is to proceed, then surely it follows that building development should be rebalanced, providing more homes away from the over-crowded counties around London.

It is time we put an end to this over-development of our environment and our town, over-development such as we have already seen in Aston Clinton and too many other towns.

However, although we are told that we should have a say in these developments and are invited to respond, this will not have any meaningful outcome unless and until there is some fundamental change in the way the planning authorities are forced by government to be truly responsive to the views of local residents. That we should have some opportunity to make our voices and our concerns heard in a meaningful way is too long overdue. I hope that in this case someone is listening to what residents have to say.

**Included files**

**Title** The Housing Strategy

**ID** EGS3782

**Person ID** 1263946

**Full Name** Rachel Scott

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

1. Quantity of housing proposed for Shootersway area of Berkhamsted

I disagree with the quantity of housing proposed. As an example, sites adjacent and near Shootersway. I don't believe it is safe to build this quantity of housing given the current transport arrangements. The traffic already queues half way along Shootersway on a normal working morning. Further, the pavement leading to the small roundabout connecting Shootersway and Cross Oak Road is too thin already for children to walk safely to Greenway School and Ashlyns School. In fact my own mother was injured by close traffic whilst walking my son to school a few years ago. The traffic situation has deteriorated since then. I know that your plan states that you're not responsible for this infrastructure but I must object to this vast increase in housing as that stretch of road is already busy and unsafe.

Housing should be built in safe quantities, on sites that are safe to use for all and particularly children.

## 2. Schools, medical and leisure

Doctors' surgery capacity has not been included other than that afforded by the new combined surgery at Gossom's End. Ditto schooling. Where's the guarantee that schools can cope and thrive?

## 3. Green Belt and green loss

Covid lockdowns and restrictions have highlighted desperate need for green space. On Shootersway, during lockdowns the 'walking loop' of Shootersway and Shootersway Lane was packed (and it's supposed to be a private road). Where else will people walk/ run if Green Belt is built on? Given the quantity of housing already built at Baerroc Park I don't feel there's justification for building on this Green Belt land. Hockeridge Woods are heavily used at current levels of housing. What plans are in place to sustain these valuable woods if housing is increased?

## 4. Transport.

Car use will vastly increase with this quantity of housing. Very few people walk and cycle to town as it is. This is exacerbated by the narrow pavements on Shootersway and Kings Road. It's certainly unsafe to walk with young children as the pavement is one person wide.

## 5. Leisure for children

Sports Centre needs an upgrade in any case. Raiders (providing essential sport for hundreds of children) already struggle to find pitches to train and play on. Playground options are unambitious presently.

### Included files

#### Title

The Housing Strategy

#### ID

EGS3791

#### Person ID

1263924

#### Full Name

Susan Moore

#### Organisation Details

#### Agent ID

#### Agent Name

#### Agent Organisation

#### Yes / No

Yes

\* Yes

\* No

#### The Housing Delivery Strategy comment

### Included files

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3801
<b>Person ID</b>	334444
<b>Full Name</b>	Mrs Alison 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>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3806
<b>Person ID</b>	1263958
<b>Full Name</b>	Stephen Marsh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I'm a resident of Berkhamsted as such I'm <b>against</b> much of the draft Local Plan for Berkhamsted, specifically against Draft Local Plan Section 23.1. The reasons for this are:</p> <ol style="list-style-type: none"> <li>1 Quite a number of sites appear to be on green belt land. I don't believe we should be eroding this very important protection of our countryside.</li> </ol>

- 2 A high number of people move to and live in Berkhamsted to use the train, mainly to London. Nearly all these sites are a long way from the station and on the other side of the High Street to the station. There appears to be no proposed transport solutions for this, for instance, an improved low cost/free bus services to coordinate with trains (ie. an integrated transport solution). As a result this will considerably increase traffic in the town centre.
- 3 Its not clear how the two plots on either side of Swingate Lane (SL) will connect to the A41. If the new residents have to go through the town centre this will also drive up traffic congestion. If the plan is to connect to A41 via the plots west of SL, traffic from the plot east of SL and from that end of Berkhamsted will pass through the plots west of SL creating a 'Rat Run' through the new residential area increasing the road traffic danger to children and air and noise pollution levels for all.
- 4 As with point 2 above many of these site are a long way for other facilities, for instance large food shops, doctors, dentists, pharmacists, churches, restaurants, bars, public buildings etc. So to access these facilities virtually all trips will be by car.
- 5 For affordable housing (which is proposed to be 40%) car ownership is lower and with no or poor public transport this could leave a significant minority isolated. For many of these sites eg. all the sites along the side of the A41 there are no bus services, the hills are too steep to cycle and too far for most to walk.
- 6 Many of the sites are directly alongside the busy A41, in the prevailing wind direction of the road with virtually no protection from trees or embankments. As such houses there will suffer considerable noise and air pollution.
- 7 I'm against the Shootersway Playing Fields being built on. The pandemic has highlighted the valuable role that exercise plays in healthy living and we should preserve every space we can for children and adults to exercise on. This plot should be removed from the plan.

**Included files**

**Title** The Housing Strategy

**ID** EGS3812

**Person ID** 1263959

**Full Name** Susie Hurst

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	I should begin by questioning the basis of the housing projections for your proposals. I understand that Dacorum Council has already questioned the projected figures for need for new homes with central government. The ONS projected need for new homes is significantly lower than that applied in your plan.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3825
<b>Person ID</b>	1263952
<b>Full Name</b>	Roy Vickers
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	What on earth will you do in 2038 when all the proposed houses have been occupied and you will be in the same position that you are now because you have only addressed the effects of the problem and done nothing to control the cause of the problem. If you keep shoring up the sides of a bath instead of turning off the taps then it's sure to end in disaster.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3839
<b>Person ID</b>	1263980
<b>Full Name</b>	Lauren Burnell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

* No	
<b>The Housing Delivery Strategy comment</b>	<p>I am writing to you as an HP23 resident to strongly object to “Dacorum’s Emerging Strategy for Growth Plan 2020-2038”, specifically in relation to the historic market town of Tring.</p> <p>Tring is a local market town that is widely regarded as one of the most scenic areas in the country; a reputation which could be destroyed by your proposed increased development of 55%. Given that the entire borough of Dacorum is only predicted a population increase of 9%, it seems unreasonable that the developments for our small town are in line with a 55% increase; even more so when considering the damaging effect this could have on Tring’s reputation as a small market town. The current green belt areas, which you propose to develop for housing, flood excessively in the winter months and are regarded as part of the “outstanding natural beauty” which makes Tring so desirable. It makes much more sense to repurpose the current vacant commercial properties in Tring (such as the empty banks, betting stores and travel agents on the high street) than developing on rural land, which add to the appeal of living at the foot of the Chilterns. Although there may be a need for more housing, Tring is not a suitable location for such industrial developments, especially given the proposed size and scale in proportion to the predicted growth of both the town and Dacorum’s population.</p> <p>If the need for housing development and retail/infrastructure really is so pressing, you should be repurposing the vacant brownfield sites situated within the high street. It is important to consider the sustainability of a retail/infrastructure development, given the ongoing pandemic and the impact this has already had on Tring’s popular local businesses. To conclude, given that the appeal of Tring is it’s small, close knit community, market town heritage and rural beauty, your proposed plans for development are far too extreme and would destroy the characteristics of the town and rural community that we, as HP23 residents, are so proud of.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3853
<b>Person ID</b>	1263982
<b>Full Name</b>	Lisa York
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>The Housing Delivery Strategy comment</b>	Too many new houses being built in Berkhamsted, you are ruining Berkhamsted
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3856
<b>Person ID</b>	1263989
<b>Full Name</b>	Lauren Ashton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	I have serious concerns about the missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy and unjustified housing targets.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3911
<b>Person ID</b>	398902
<b>Full Name</b>	Dr Nigel Bamforth
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>The Housing Delivery Strategy comment</b>	<p>I disagree with the Local Plan and the housing numbers proposed, for Berkhamsted.</p> <ol style="list-style-type: none"> <li>1 The housing numbers in the Local Plan across Dacorum, and therefore Berkhamsted are excessive and wrong. They are well above the forecast housing need for the Borough as calculated by the ONS!</li> <li>2 The impact on West Berkhamsted is disproportionate, does not consider existing and major development in the area (Bearroc) and severely impacts infrastructure (roads, schools etc.), pollution, congestion, road safety, local ecology, health and wellbeing of local residents.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3929
<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	
<b>The Housing Delivery Strategy comment</b>	<p>I have serious concerns about the allocation and how the numbers have been calculated and that we haven't avoided Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. There is no taking into account how many more people are now equipped to work at home and the potential release of office space for housing. Let the post-pandemic working practices be taken into account.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3934
<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>The Housing Delivery Strategy comment</b>	In view of the fact that there will a lot of empty office space the planned growth figures are flawed. We do not need this many new houses.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS3963
<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>The Housing Delivery Strategy comment</b>	<p>Whilst the allocations have clearly been carefully thought about, the numbers do appear to risk fundamentally changing the character of some areas. Tring for example, is a market town, not a large urban area. With a large development already under development on the west side of Tring, tyhhe significant proposed development to the east and south, will fundamantally further change the character of the area. Growth must be both sustainable and balanced against what drives demand in those areas. Surely, a more diverse allocation of sites would give a more diverse offering, and hence attract a more diverse group of residents. This will boraden the economy base and the sustainability of the entire community. If every village and town took a small (proporitonate) number of houses, that would give a more balanced growth.</p> <p>A focus on large developments also risks stretching services and further pressuring peaks of demand (eg rush hour trains, busy junctions, etc etc) to levels which detract from the enjoyment of living in the area. Whilst large developments provide a platform for the authority to seek planning contributions whether that be through S106, CIL (where relevant) etc, the viability arguments often reduce the potential contributions. Standard approaches to development and profit</p>

assumptions undermine the true net gain of those contributions and the Authority must consider limiting the scope for viability arguments.

**Included files**

**Title** The Housing Strategy

**ID** EGS4047

**Person ID** 1262852

**Full Name** Nick Wyke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

The housing targets contained in Policy SP2 and SP4 of the Dacorum Local Plan have been based on the changes to the Standard Method of Calculating Housing Need. These changes were put forward as part of the governments “changes to the current planning system” consultation in August 2020.

The proposed changes to standard method of calculating housing need would have reduced Dacorum’s housing targets from 1023 dwelling per annum (DPA) to 922 DPA.

The government announced on 16 December 2020 that it would retain the standard method of calculating housing need in its current form. Instead there would be a renewed focus on developing brownfield land and development within the 19 most populated cities and urban centres.

As the changes previously considered to the standard method of calculating housing need are no longer proposed, the use of the lower housing need figure of 922 DPA is neither sound nor justified as required by paragraph 35 of the National Planning Policy Framework (NPPF).

The housing figure of 1023 DPA should be used as the basis for calculating the housing need for policy SP2 and SP4. This would increase Dacorum’s housing targets to a minimum of 18,414 net additional homes across the Borough over the period 2020-2038. This equates to an additional 101 dwellings per annum.

Given the increase in housing targets there is a need for the Dacorum Local Plan to find further deliverable housing sites that can be allocated in the local plan.

An option agreement has been signed with the landowners of the site west of Pickford Road, Markyate. It is therefore deliverable and can be brought forward for development subject to planning. An outline planning application for 4 dwellings has recently been submitted (LPA Ref; 21/00441/OUT) and is currently in the process of being determined. This application follows a previously submitted application for 6 dwellings (LPA Ref; 20/01538/OUT) that was withdrawn in November 2020 after officers felt that a scheme for 4 dwellings would be more in keeping with this part of the village. This advice led to the scheme for 4 dwellings being submitted to Dacorum Borough Council.

Paragraph 68 of the NPPF recognises the importance that small sites can make in helping to meet the housing requirement of an area and can often be built out relatively quickly. Paragraph 7.22 of the local plan similarly recognises the importance that allocating small and medium sized sites can play in providing short term flexibility and contingency, reducing the reliance on the larger growth areas. The current housing targets in the adopted local plan are 430 DPA but the Standard Method of Calculating Housing need will see the housing targets more than double to 1023 DPA. The results of the 2020 Housing Delivery Test were published in January 2020. It shows Dacorum Borough Council have delivered 89% of their required housing over the past 3 years and now need to prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years. A new approach to meeting housing needs is therefore urgently needed for which smaller sites on the edge of settlements must be part of the solution.

The site was assessed (reference no. 113) as part of the Site Assessment Study that was undertaken by AECOM which forms part of the evidence base to the draft local plan.

The site was considered unsuitable for allocation in the local plan due to the need to cross the designated local wildlife site at the front of the site. We strongly object to this wording for the reasons set out below.

An Ecological Impact Assessment (ECIA) was undertaken by Prime Environment and Samsara Ecology to support the previously withdrawn application for 6 dwellings and the recently submitted application for 4 dwellings. The ECIA looked at the effect the access track would have on the local wildlife site. It concluded that the construction of the access road along the edge of the local wildlife site would result in the loss of a small area (approximately 0.01 HA) of the grassland which makes up the local wildlife site. The effect was considered negligible for the plants which make up the grassland habitat as the road will be put in along the edge of the area which is already poached and worn by footfall and vehicles and is next to the existing access track serving the adjacent dwelling (Frindles). The ECIA acknowledged there would be a minor negative impact on the LWS but would be compensated through better management of the LWS grassland to allow a greater species diversity to develop. The improved management will include two cuts being undertaken at the end of May and August during the first two years with all arisings being removed from the site. All years after that will involve one cut at the end of August with all arisings being removed from the site. No vehicles will be permitted onto the LWS area. Collectively this was considered by the ECIA to result in a positive change to the LWS. The County Council's Ecologist accepted this position following initial concerns be raised over the impact on the local wildlife site. Similarly, the formal written pre-application advice we received (LPA Ref; 4/00426/19/PRE) dated 24/04/2019 did not raise this issue when considering the principle of development on this site.

It is therefore considered that any impact of development on the local wildlife site can be overcome. The site at Pickford Road, Markyate is also outside of the green belt and Area of Outstanding Natural Beauty. The retention of the hedge

along the front of the site will ensure the listed buildings opposite are protected whilst containing development to the front of the site and retaining the hedge to the rear will minimise impact on the AONB to the rear.

Allocating this site will go some way to help meet the required increase in housing targets. Given the above constraints to allocating the site can be overcome it should be considered a suitable location for housing and therefore allocated for 4 dwellings in the local plan.

**Included files** [201123 015 Land at Pickford Lane EclA V3.pdf](#)

**Title** The Housing Strategy

**ID** EGS4054

**Person ID** 1264169

**Full Name** Alex Crossette

**Organisation Details** Old Residnet

**Agent ID** 1264131

**Agent Name** Alex  
Crossette

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy 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.

This government loves to tout the strapline of levelling up Britain and making the North a powerhouse. Would other areas, further away from the commuter belt of London and the South East, of the country be more suitable for population growth and the increase of local jobs and government aid. Does not seem to fulfill the criteria.

**Included files**

**Title** The Housing Strategy

**ID** EGS4063

**Person ID** 1262892

**Full Name** Jean Farrer

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** Your housing development is based purely on an arbitrary target driven by the Government standard methodology rather than a considered study of the actual housing need for Dacorum. Evidence to date in Berkhamsted shows that you attract affluent families out of London who can afford inflated prices for executive houses rather than meeting genuine local need for affordable accommodation.

I fully support BRAG's submission for this section.

**Included files**

**Title** The Housing Strategy

**ID** EGS4090

**Person ID** 1264210

**Full Name** Fiona Fulford

**Organisation Details** myself

**Agent ID** 1264200

**Agent Name** Fiona Fulford

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The strategy is based on unsound numbers and therefore SP4 is wrong- the ONS numbers from 2018 should be used which result in a projected requirement of around half the 16596 numbers currently outlined.  In addition the council needs to make developers actually deliver on their promises for affordable housing, rather than reverting to more profitable larger homes at the final stage
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4115
<b>Person ID</b>	1264243
<b>Full Name</b>	Howard 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>The Housing Delivery Strategy comment</b>	Clearly the requirement for planning development needs a thorough reevaluation based on the 2018 ONS figures rather than the 2014 currently being used.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4121
<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>The Housing Delivery Strategy comment</b>	This is truly awful and very poorly thought out. DBC have simply accepted a huge target of homes (in a way that I understand they do not need to) and have now just shoved them in anywhere. I can mainly comment on the Berkhamsted plan. There seem to be pockets of housing to be built in the South of Berkhamsted on whatever bits of greenbelt land that can be found. They mainly rely on transport links to the A41 through Shootersway. In pre-covid times this road was already backed up regularly with cars at a standstill trying to get through the traffic lights (the jam would go well past the cross oak roundabout and down the road. The congestion has already increased significantly with the building of Bearroc Park. As a resident of this road I regularly see jams in front of my house with cars purging out fumes all morning and forget it if you need to travel anywhere at rush hour. I do not know whether this will change as a result of post pandemic working practices but I suspect that there will still be a lot of people needing to travel down this road. If this size of development absolutely must go on then a new entry to the A41 needs to be created (potentially see the Bulbourne Cross project rather than this awful mishmash of little housing pockets all around Shootersway which will make travel completely unsustainable as it's impossible to imagine expanding the road there).
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4148
<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>The Housing Delivery Strategy comment</b>	As Housing Strategy is a crucial part of the plan it is deeply concerning that it contains so many misleading statements. The calculations alluded to in para. 7.3. are largely demand led and pay little attention to realistic supply. Offering to pay speculative landowners large sums of money for their cooperation should not be the basis for democratic policy-making.

To develop a key strategy at a time when so many factors are changing is close to dishonest.

**Included files**

**Title** The Housing Strategy

**ID** EGS4180

**Person ID** 1264269

**Full Name** Paul de Hoest

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

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

Welcome as the intention is to increase "affordable homes" this should go further - there is no need to keep building more and more oversize houses with inadequate gardens. Create integrated local communities wherever homes are to be built. Think community not individual.

**Included files**

**Title** The Housing Strategy

**ID** EGS4184

**Person ID** 1258646

**Full Name** Jane Timmis

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>The Housing Strategy</b></p> <p>I find that the housing numbers that this Plan looks to deliver are <b>not acceptable. It is not evidence based.</b> The total number of 16,596, are simply not required. The data is based on 2014 housing need, which is out-of-date. The Office for National Statistics' figures of need compiled in 2018, predicted a number 40% fewer than 16,596; and in the last year a further 1.4million people have left the country. This cannot be allowed to continue on the wrong premise.</p> <p>Under NPPF guidance the Green Belt is to be protected, but this plan does anything but protect it!</p> <p><b>Near on 2,000 acres of Green Belt</b> is being sacrificed for reasons of greed and incorrect data.</p> <p><b>Do build what is needed</b> - supported housing, affordable housing and needed housing, but do not concrete over the Green Belt (even allowing for green spaces).</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4196
<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>The Housing Delivery Strategy comment</b>	The ONS forecasts just 9% growth in population growth over the period in question. The plan also fails to take into account significant effects of the pandemic and Brexit on the economy and population growth. Given that it's based on such outdated and inaccurate estimations, I have no confidence that policy SP4 is fit for purpose.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4219
<b>Person ID</b>	1263248
<b>Full Name</b>	Johnjo McDermott
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>This is a land grab by big developers to provide more unaffordable housing!</p> <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>

... there are currently electric vehicle charge points in Forge car park and at Tesco, this is clearly insufficient for a town the size of Tring. Environment

... the plan should allocate land for new allotments for the residents so they can grow their own fruit and vegetables.

... the plan must commit to increase habitat for wildlife, including wildlife corridors and re-wilded areas to increase bio-diversity.

... there should be recreational corridors built into the plan to promote cycling and walking in a safe environment, they should be wide with natural vegetation and not narrow alleyways.

#### Sustainability

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

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

#### Summary

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

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4223
<b>Person ID</b>	1264306
<b>Full Name</b>	Peter 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>The Housing Delivery Strategy comment</b>	It is considered that there is a significant risk of traffic impact from new development which may affect Buckinghamshire and traffic links that serve Buckinghamshire particularly on the A41 which may cause impacts outside the plan area particularly on Aylesbury and potentially on other locations such as Chesham. As highlighted in a recent Duty to Cooperate discussion between the two councils detailed discussions should be undertaken between the two councils to evaluate and address the potential traffic impacts arising from proposed development on cross border traffic flows as part of the preparation of the pre-submission consultation draft plan.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4257
<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	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Policy SP4 establishes how the Council propose to meet its housing requirement through the emerging plan period. As set out in the response to Policy SP2, our client Landhold Capital is concerned at the Council's decision to set the housing requirement at 16,596 or 922 dwellings per annum, despite the standard methodology housing requirement for Dacorum of 1,023 per annum or 18,414 dwellings in total. As set out in the response to SP2, it is recognised that when the Council published this version of the Plan for consultation there was some uncertainty regarding the housing requirement due to the Government consultation on revisions to the standard methodology, however the figure used by the Council for this plan was a draft figure that was subsequently revoked in December 2020 when the Government confirmed the 2018 standard methodology (with minor revisions) was to be used. As a result, Landhold Capital is concerned that Policy SP4 is currently based on a housing requirement that is lower than should be the case, and the strategy for delivering for delivering this housing requirement is therefore considered to be flawed and not sound.</p> <p>The Council clearly sets out in Table 2, the sources of housing land supply as proposed through the emerging Plan, which are described in Policy SP4. These together demonstrate the Council's reliance on a small number of large strategic urban extensions to deliver the majority of the housing requirement, with only a small number of small to medium scale sites proposed, such as those at the three large villages. Figure 2 of the emerging Plan meanwhile illustrates the Council's</p>

assumptions with regards to housing trajectory, suggesting that the Council expects delivery to increase significantly by 2025/26, from which point the Council anticipates that it delivery will exceed the requirement consistently for a number of years. These figures appear optimistic, in light of the plan's reliance on strategic sites that are to be released from the Green Belt, with only two full monitoring years between the Council's anticipated adoption of the Plan according to the latest LDS and this increase in delivery. Whilst to some extent any gaps in supply in the short term will be filled by the small to medium sites, it is considered that the Council's trajectory is optimistic and reliant on large sites coming on stream in a short period of time. This does not reflect the general understanding of strategic site delivery, which is that these are sites that can often take long periods of time to come through the planning application process and can require significant infrastructure to be delivered prior to the first completions of dwellings. The Council should take into consideration the contents of the research report by Lichfields which establishes that for sites over 500 dwellings, it can take on average five years to secure planning permission and deliver first completions, whilst for sites over 1,000 dwellings that can increase to almost seven years.

Within the sources of housing supply, windfall sites are anticipated to make a significant contribution, with Table 2 suggesting that over 2,400 dwellings or 14% of the housing supply for the plan period will be delivered on windfall sites through the plan period. The Council's rationale for the inclusion of this large windfall allowance is understood, as the Urban Capacity Study dated November 2020 demonstrates the high completions on windfall sites in the Borough in recent years. Table 8 of the report identifies that delivery from windfall sites has consistently represented a high proportion of total completions each year since 2006/07, with an average figure over the period to 2019/20 of 67%. Whilst this would demonstrate the importance of windfalls to the Council's housing supply, it suggests that a large proportion of the development in the borough in recent years has not been plan-led, as if that had been the case then it would not be expected that there would be high levels of windfall development. Furthermore, there is not likely to be an inexhaustible supply of windfall sites in the Borough that are actually suitable and feasible to deliver development. Whilst the delivery of suitable windfall sites within sustainable locations such as Kings Langley is restricted by the Green Belt extent, limiting the potential for housing to be focused toward the most appropriate settlements.

This is particularly the case given the constraints posed by the Green Belt and the challenges associated with bringing forward development through the planning application process on Green Belt or sites otherwise constrained by issues referenced in Footnote 6 of the Framework. The Council should not seek to be so reliant on windfall sites, and instead should be seeking to allocate more sites through the emerging plan with any development on windfall sites to be considered as additional and not counted towards the supply so that if windfall developments do not materialise as anticipated, the Council will not be left with a gap in its housing supply that it is not possible to fill. This is important to ensure that the plan meets the effective test of soundness set out in Paragraph 35 of the Framework, which requires the plan to be deliverable over the plan period.

The sources of supply set out in Table 2 also confirms that the Council has not sought to secure of a buffer when comparing the housing requirement to the sources of housing supply. The buffer or contingency surplus is only 303 dwellings, which represents a buffer of only 1.8% compared to the proposed housing requirement. This does not provide the Council with much flexibility if the allocations proposed do not deliver as anticipated.

In any event, the figures for the supply and the trajectory are predicated on a lower housing requirement than should be the case for this Plan, which will lead to shortfalls in supply. The Council should accordingly seek to allocate further sites that are small to medium in scale to help deliver housing early in the plan period, including further consideration of previously identified opportunities such as those to the west of Kings Langley. This is necessary in order to ensure that the Plan proposes a strategy that will at least fulfil the standard methodology housing requirement for the Borough across the plan period, as well as delivering a substantial buffer. This is required to provide flexibility and meet the requirements of Paragraph 23 of the Framework which in relation to strategic policies states *'to provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development'*. This is an essential requirement for the Plan to be found sound as per Paragraph 35 of the Framework, and is necessary be found to be 'positively prepared' in relation to housing needs.

**Included files**

**Title** The Housing Strategy

**ID** EGS4277

**Person ID** 1264321

**Full Name** David` Fox

**Organisation Details** personal

**Agent ID** 1264318

**Agent Name** David  
Fox

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** The strategy is based on unsound numbers and therefore SP4 is wrong- the ONS numbers from 2018 should be used which result in a projected requirement of around half the 16596 numbers currently outlined.  
In addition the council needs to make developers actually deliver on their promises for affordable housing, rather than reverting to more profitable larger homes at the final stage

**Included files**

**Title** The Housing Strategy

**ID** EGS4280

<b>Person ID</b>	1264327
<b>Full Name</b>	MATTHEW GITSHAM
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>Concern regarding impact on Green Belt (and specifically the Chilterns Area of Outstanding Natural Beauty (AONB)).</b> I am concerned that the proposed housing development of Green Belt land across Dacorum will cause significant harm to the Green Belt and AONB, and also jeopardises plans to extend the AONB and upgrade its status to a National Park.</p> <p><b>Concern regarding over-provision of housing.</b> I know that more housing is needed, especially genuinely affordable housing. However, I am concerned that the scale of the proposed development is excessive and unnecessary and based on flawed calculations and assumptions. Specifically, I am concerned about how projections have been based on a dubious algorithm that has since been discredited and withdrawn, and also based on outdated 2014 ONS data when basing calculations on the more recent and relevant 2018 ONS data.</p> <p><b>Concern regarding underestimating brownfield regeneration opportunities.</b> Again, while acknowledging more housing is needed, I believe that the opportunities for brownfield housing developments has been underestimated, particularly given the impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which create more opportunities for conversion of commercial space (like office and retail) to residential use.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4293
<b>Person ID</b>	1263582
<b>Full Name</b>	Jan Maddern
<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>The Housing Delivery Strategy comment</b>	The housing numbers being imposed on Dacorum are completely inappropriate and unrealistic. I would urge the council to stand up to any government department on this. We should NOT be building on greenbelt land. These numbers being forced on the borough will in turn mean that too many small flats are built rather than the type of housing we need, just to meet the number requirements, giving high density housing that is inappropriate for families. What we need is houses; family accommodation with gardens.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4304
<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> * <b>Yes</b> * <b>No</b>	No
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4307
<b>Person ID</b>	1264333
<b>Full Name</b>	BARRY PRITCHETT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>As a resident of Berkhamsted for 25 years, I strongly object to the amount of housebuilding proposed for the town. It will completely alter the nature of the town that has been designated both by the BBC and the Sunday Times as one of the best places to live in England.</p> <p>This amount of building will overstretch the resources of the town in terms of road capacity, school and nursery places and healthcare. The lack of local employment opportunities will greatly increase the problem of rush hour congestion.</p> <p>Hemel Hempstead, which has always been designated for growth, would be a far better place for many of these houses.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4328
<b>Person ID</b>	1261265
<b>Full Name</b>	Richard Case
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p><b>Too much negative impact on Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC)</b></p> <p>These harmful proposals would result in the loss of a huge 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. In addition these plans also threaten the prospects of extending the AONB or even upgrading it to a National Park. This is despite the National Planning Policy Framework (NPPF), paragraph 11, footnote 6 which allows</p>

local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.

**Included files**

**Title** The Housing Strategy

**ID** EGS4335

**Person ID** 1145658

**Full Name** mr Steen Dalgas

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

*My wife and I are residents of Hall Park, Berkhamsted. We are associated with the One Voice alliance (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) and 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*

*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.*

*Please can you ensure that our opposition to the plan for the above reasons is duly noted.*

**Included files**

**Title** The Housing Strategy

**ID** EGS4344

<b>Person ID</b>	1264336
<b>Full Name</b>	IAN MACGILLIVRAY
<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>The Housing Delivery Strategy comment</b>	<p>I have lived at Northchurch, Berkhamsted, Herts. for more than 8 years. One of the attractions of living here is the wonderful view I have over Nothchurch Common. I am very concerned that the Plan will have a damaging effect on that view and on the Green Belt generally in this area. 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. 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 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.</p> <p>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 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. 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.</p>

The plan as proposed does little to address the improvements in infrastructure required to support the proposed increase in housing. We have particular concerns regarding the impact on water supply and waste water disposal. The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030. The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

The Emerging Strategy for Growth appears to be based on 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.

I am also concerned that the possibility of a link road through our delightful close is again being considered. This would completely destroy its charms and make it a rat run.

I do hope you take my concerns into account and change the proposed Plan accordingly.

**Included files**

**Title** The Housing Strategy

**ID** EGS4351

**Person ID** 1261193

**Full Name** Nicola Baker

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

## The Housing Delivery Strategy comment

am emailing you as a resident of Dacorum and Tring. I strongly object to the current local housing plan proposals for Dacorum and particularly for Tring.

The current plan relies far too much on the use of valuable green belt land. Whilst the government allows for use of some green belt in 'exceptional circumstances' I feel Dacorum are misusing this guideline with the plan using 60% of green belt land. This is not only an unacceptable amount it is also misleading as whilst it maybe 60% in Dacorum overall it is far exceeding 60% of green belt in the proposal for Tring. In fact the majority of the proposal is on current greenbelt land in Tring, which is completely insupportable and wholly objectionable. This massive use of green belt land is damaging to this area of outstanding natural beauty, to our wildlife, ancient hedgerows and general well being. If the current situation has showed us anything it's that people need access to green spaces for their mental health, please don't let all this essential green space be taken from the residents of Tring and Dacorum. One such area within the plans currently used by the children and people of Tring for multiple sports including our local football and rugby teams. This is essential green space that must not be so easily dismissed and built on.

The percentage of housing allocated to Tring is double per population head than that planned for the rest of Dacorum. We are a small town and whilst there must be some growth the scope of these plans far exceeds what is necessary, required and sustainable for the town to support. Far too many houses in the wrong places. The amount of housing planned for Tring will overwhelm our small market town, our roads, our local amenities and bring with it greater pollution from the increase in cars and traffic. Our over subscribed schools cannot take more children. The only secondary school in Tring though undergoing a massive rebuild is NOT expanding its capacity for students. The massive housing development therefore will swamp our the school and leave the Dacorum villages surround Tring with no where to go. Once again this is unacceptable. The town in normal times already has full doctors surgeries, over subscribed secondary and primary schools, packed supermarkets and busy roads it cannot take the massive influx of the quantity of new residents suggested in the plans. It will already struggle to accommodate the new residents of the housing developments currently being built on Tring green belt. Our historic town centre was never designed to support such a huge amount of residents and all that those residents bring with them.

Please protect our historic market town and our green belt from being over run with ill thought out housing developments. For any future housing developments please stop the unsympathetic building of cramped housing with minimal green spaces and gardens. These housing 'estates' are always of a standard 'one design fits all' plan by large companies that do not retain the character of the town. Please go further insisting that the houses built follow the highest levels of sustainable green measures to protect this town, its residents and ultimately this planet for future generations.

Please stop the current plans, revise the sums of what is needed and where. Make the plans fit this local area and it's current residents.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4356
<b>Person ID</b>	484254
<b>Full Name</b>	Mrs Janet 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>The Housing Delivery Strategy comment</b>	<p>We have a great community in Berkhamsted and Northchurch and I do not want the extra traffic that these new developments will bring and I cannot understand the lack of thought that seems to have gone into this madness. "The local plan. "</p> <p>— The over all number of houses proposed - 16,899 across the borough — is just not justified by the latest statistics on projected population growth.</p> <p>The massive developments planned in Tring and Berkhamsted will cause further gridlock in Northchurch and the High St as well as the 400 houses earmarked for Northchurch itself? Really where will these people park? Go to school? Use the doctors where you already have to wait 2 weeks for appointments.</p> <p>— The grounds for encroaching on the Green Belt - the law says we can only build on the Green Belt if it has proven to be necessary - this is not necessary.</p> <p>— Insufficient value has been put on the development of Green Belt both in terms our mental and physical wellbeing and the impact on climate change.</p> <p>I think this plan should be re-done in consultation with local councils and our elected representatives.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4370
<b>Person ID</b>	1264343
<b>Full Name</b>	JONATHAN HOAR
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Just wanted to register my objection to the housing proposal in the Local Plan, especially the multiple developments in west Berkhamsted.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4371
<b>Person ID</b>	1264337
<b>Full Name</b>	Jane 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>The Housing Delivery Strategy comment</b>	Bovingdon - Land at the corner of Chesham Road, Molyneaux Avenue. Consideration should be given to those living in Lancaster Drive and adjoining closes to have a footpath over that land to enable residents to safely travel by foot to and from the schools, nursery, GP and shops in Bovingdon High Street as for the past 33 years there has been no

designated and safe footpath for these 56 residences. It has meant joining Chesham Road at the corner of Molyneux Avenue where there are no street lights, no footpath on one side of the road and a narrow footpath on the other side of Chesham Road which does not permit two adults to walk side by side, nor to enable parents to safely walk with children and buggies without stepping into the road. 33 years have been waited already (since march 1988). It is about time the matter was addressed.

**Included files**

**Title** The Housing Strategy

**ID** EGS4375

**Person ID** 1152050

**Full Name** Mr Christopher Talbot-Ponsonby

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

Dacorum Draft Local Plan 2020-2038  
 1. The number of proposed houses far outweighs the capacity of our services such as roads, water usage and sewerage.  
 2. There is not the need for so many houses for the local working population. The users would presumably work in London creating extra pressure on the local road network and train services.  
 3. This does not even take into the account the extra need for Doctors and Schools.  
 4. Developments so close to a busy bypass needs to be built with thought. Has consideration been given to the air quality to those houses?  
 5. The extra traffic generated coming into the town would increase the Nitrogen dioxide levels in the centre of town which is already above WHO guidelines at times.  
 6. Houses should only be built for local actual need and not perceived government assumptions.

**Included files**

**Title** The Housing Strategy

**ID** EGS4381

**Person ID** 1261539

<b>Full Name</b>	Kirsty McCallan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Firstly, I am terrified. Supporting health and wellbeing of communities.. Removing the landscape which provides valuable escape from a more turbulent world.</p> <p>Mitigating climate change.. Conserving and protecting natural environment.. By removing the natural environment and removing the landscape that allows water to be absorbed from excess rainfall.</p> <p>..by removing trees/hedgerows which comprises native species, removes the nesting, feeding and travel corridor used by a huge variety of birds, insects and other mammals.</p> <p>An increasing problem is the effect of our changing climate; high winds and heavy rain sweeping across ever larger fields can lead to flooding and soil erosion. Trees and hedgerows helps to create a natural barrier to flood water, reduce sediment being drawn into watercourses and increase water absorption into the ground. They also capture pollutants contained in run-off such as fertilisers and pesticides and provide habitats for natural predators.</p> <p>Long Marston and Wingrave flooding on the 14th January 2021..</p> <p>Fire fighters pumping the water away.... Yet their is talk of demolition of the fire station. They are vital and needed for the community.</p> <p>I have friends who live in Ardley Bicester, new building development is 5mins away.. This year, flooding and over flowing sewers meant they had to spend Christmas shovelling sewage and pumping water from their home/garden.</p> <p>My Father lives in Wistow fen village. He planted hundreds of trees 2/3 years ago around his fields. His entire village needed to be evacuated and spent Christmas eve and period in a local hall... Only my father and his two neighbours didn't need to be evacuated. The Village had not flooded before, there was a new housing development this last year too.</p> <p>Parts of Chesham has flooded recently, the fields along marshcroft Lane tring have flooded as they always do, up and down the country we only need to turn on the news to see increased flooding. New building and climate change go had in hand, especially when it is so vast and such an sudden increase in numbers too.</p> <p>Are the local councils willing to offer financial support to those of us that have damaged homes due to flooding, reimbursements for reduced value in homes if green belt land is trampled over, and places of respite go unseen and difficulty in selling, support for already little parking spaces outside homes without driveways in an ever increasing small town.</p> <p>Financial aid to support the small businesses and mental wellbeing lost due to covid instead of building over priced unnessary homes?</p>

We are in an area of outstanding natural beauty, with supposedly protected areas of green belt too. The damage to the character of the town, the ecological damage from the pollution, the destruction, the psychological damage to people who will be totally overwhelmed by the loss of open space & sudden growth of the towns.. All of this is irreversible. Are the developers really making affordable housing and not just giving a small portion to families on housing support, but by building smaller 2/3 bed homes no more than £350k? Are the buildings including drainage to cope with the sudden growth in population and by also replanting hedgerows and hundreds of trees? Is this really necessary?

**Included files**

**Title** The Housing Strategy

**ID** EGS4394

**Person ID** 1264350

**Full Name** Mr Rod Larman

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I wish to state that I strongly oppose the Dacorum Local Plan.

I fully support 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, in opposing the 'Dacorum Local Plan - Emerging Strategy for Growth' because:

- 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.
- 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.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4397
<b>Person ID</b>	1264352
<b>Full Name</b>	Margaret Gibson & Richard 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>The Housing Delivery Strategy comment</b>	<p>As residents of Dacorum living in Great Gaddesden we are writing in response to the proposed DBC Strategy for development. We have a number of concerns about its impact on the local environment.</p> <p><b>Housing provision.</b></p> <p>We are concerned that the Strategy appears to be based on out of date ONS statistics rather than the more recent 2018 statistics. This has resulted in a considerable over-estimate of housing needed in the area. We understand that using the 2018 statistics would halve the amount of housing predicted to be required each year. This one correction alone would mean much less impact on the local environment, much of which is Green Belt, and would be less likely to jeopardise the recent proposals to upgrade the Chilterns AONB to a National Park. The proposed Strategy may well threaten the AONB status if movements through the area increase significantly as seems inevitable with the current Plan.</p> <p>The proposed new housing areas to the NorthWest of Hemel are far from the existing transport and other infrastructure. The Strategy amazingly looks to an increase in cycling, walking and passenger transport to enable residents to access that infrastructure. This ignores the geography of this area; it is an area of hills so most people will choose to use a car. Central Hemel is already suffering significant congestion and large housing developments in the proposed areas will clearly increase it. The Plan does not set out how this will realistically be dealt with.</p> <p><b>B404/Dagnall Rd congestion</b></p>

The Dagnall/Hemel Hempstead Road is a rural road with a single lane, weight-limited bridge that is a bottle neck at Water End. Traffic volumes are already an issue at rush hour causing long holdups. The increased traffic from the proposed housing provision as it stands would make those hold ups much worse and make communications and access for the outlying communities, dependent on this route, a very significant problem.

The proposed new link road from the B404 to the M1 would inevitably produce a large increase in traffic on the B404 and the minor roads heading off the B404 towards Berkhamsted and Tring. These roads are not suitable for any increase in traffic and are not suitable for upgrading. The Strategy appears to export traffic congestion from Hemel to these minor roads and the rural communities such as Great Gaddesden and Potten End.

In short the local road network does not have the capacity for the proposed development.

### **Natural Environment**

We are fortunate in having one of roughly 180 chalk streams in the world running through the Gade valley. The water meadows around it are one of the most significant natural features of the area. Laudable efforts to restore the river by DBC and others after years of what was, at best, neglect (eg licensing a waste site next to the river at Bishops field and then neither checking what was dumped there or enforcing the provisions for topsoil replacement; out of date abstraction licences given to the water company which have allowed it to abstract at the expense of the river flow ) would be undermined by this development.

When I spoke to a water company representative a year ago about the (lack of ) water in the Gade - it having dried up almost as far down as Pipers Hill Road - he said they were charged with providing water required by developers. They were not allowed to say " We can't do it without damaging the river/aquifer". If this is correct it is up to those developing this Strategy to question the water authority about the where the water required will come from and to then consider the impact of hugely increased abstraction on the Gade and wildlife around it, as the water authority remit does not extend to stopping inappropriate and damaging proposals.

### **Summary**

Realistically the proposed Strategy will impact the natural environment of the Gade valley. This is something that is not replaceable once gone. In disappearing the fields on the sides of the Gade valley, increasing traffic volumes on minor roads, abstracting far more water than is sustainable the Plan appears to be more about putting large housing developments on empty spaces on a map rather than a closely thought out scheme. This is simply not in the interests of the inhabitants of the area and will be detrimental to their environment.

We ask you to reformulate the Strategy taking into consideration these reservations and objections.

**Included files**

**Title** The Housing Strategy

**ID** EGS4400

**Person ID** 1264355

**Full Name** Chris and Esther Stewart

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** We wish to express our disagreement to the Local Plan for Berkhamsted and the housing numbers proposed, due to the lack of adequate infrastructure and subsequent congestion.

**Included files**

**Title** The Housing Strategy

**ID** EGS4426

**Person ID** 1264378

**Full Name** Nicholas Kurth

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>The Housing Delivery Strategy 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> <li>- Being slightly more parochial, I could find no reference to the need for the expansion of medical and dental facilities in Berkhamsted. The current arrangement are already overstretched and unable to cope.</li> <li>- This is little affordable housing in Berkhamsted and development must be directed towards filling this gap. I was appalled that the new Bearroc Park development provided yet more expensive executive homes. I detect the hand of developers here, seeking increased margins. This must stop in order to meet the requirements of all sections of society.</li> <li>- I could find no reference to the need to uplift the funding for facilities support provided to areas. For instance, HCC is currently unable to support the current road network and this level of development will exacerbate the problem.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4429
<b>Person ID</b>	1264381
<b>Full Name</b>	Helen Nelmes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>As a resident of Dacorum for over 35 years, I have enjoyed walking in and around the beautiful area.</p> <p>I am extremely concerned that the plan to build so many dwellings on the lands around here, some of which will be using green belt land. We have been without our local hospital now for some years, the amount of people using Watford must</p>

be near breaking point. I really do not believe that the amount of people from this new phase of building will be able to be safely served by one dated hospital. Has no thought of infrastructures gone into this planning?  
 I am extremely worried that our local population will have nowhere to walk locally and enjoy the countryside, with no consideration to local wildlife!

**Included files**

**Title** The Housing Strategy

**ID** EGS4432

**Person ID** 490163

**Full Name** Mr Grahame Partridge

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I disagree with the Local Plan to over develop the land between the western boundary of Shootersway and the A41 trunk road,  
 The developments planned along Shootersway, West Berkhamsted between the existing road and the A41 boundary will result in houses suffering from noise and air pollution because of the proximity of the main A41 dual carriageway. Respiratory infections are rife at present and the air pollution caused by the nearness of the A41 and the prevailing wind direction will blow polluted air straight at the proposed new developments. This will create an environment for poor health. This is not to be recommended for future generations.  
 The housing numbers along Shootersway are too excessive for the area. The road traffic already backs up at peak times and with extra vehicle volumes associated with hundreds of more houses the traffic problems will increase leading to more localised pollution of the air.  
 There is only one footpath along Shootersway on the eastern side of the road. If children from the new developments are to be encouraged to walk to local schools there needs to be a footpath on both sides as a safety consideration. Otherwise children and adults will be forced to cross Shootersway in an unsafe way.

**Included files**

**Title** The Housing Strategy

<b>ID</b>	EGS4447
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4477
<b>Person ID</b>	1264399
<b>Full Name</b>	Miss Sarah Battersby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>I strongly object to re-designation of current Green Belt sites and of any housing development on them, apart from a small number of homes for farm workers, for the following reasons:</li> </ul>

- **Scale of the development.** There are far more homes proposed for Dacorum than are needed and once lost they cannot be replaced. I support the Campaign for the Protection of Rural England Hertfordshire (CPREH) in their suggestion that the Office For National Statistics 2018-based household projections are a more reliable basis for the calculation of need. This establishes the number of houses required is about half that in the Local Plan and means that many protections that exist for many sites should not be disregarded.
- **Merging of towns and villages.** We are in danger of having just one or two fields preventing the creation of the conurbation of Dacorum. Many villages are in danger of losing their identity as a separate community.
- **Loss of good and versatile agricultural land.** Re-designation of green Belt sites does not prevent loss of the Grade 2 (Tring) and Grade 3 (Berkhamsted) agricultural land. Losing substantial tracts of arable land will mean we are even more reliant on imports, which will increase our carbon footprint and reduce our ability to feed our nation if at war.
- **Loss of important rural hedgerows, tree-lined verges and biodiversity.** Unlike mature trees, these do not appear to be high on the Councils agenda, but rural hedges over 30 years old are important enough to be protected nationally under the Hedgerow Regulations 1997. This is due to their importance to biodiversity, wildlife movement and the character of the environment. Most of our local rural hedges are hundreds of years old and some are a habitat for species that are important sites to protect to maintain biodiversity under Section 41 of the Natural Environment and Rural Communities Act. As a home to birds, insects and wildflowers like the Bluebell, they are also a point of interest for birdwatchers, natural historians and walkers. The Council has the ability to protect them by placing a Hedgerow Retention Notice or Preservation Order on them but house builders seem to grub them up even where it is not necessary. Rural hedgerows lose their protection once designated for housing, so more Hedgerow Retention Notices are needed, particularly around developments that are approved on farmland.
- **Impact on well-being and the rural economy.** Our Green Belt sites are not only beautiful in their own right but they are close to Areas of Outstanding Natural Beauty and provide a feel-good factor and a recreational resource, helping to reduce stress and time-off work. Development of sites close to our AONB's will also prejudice chances of achieving National Park status, as recommended by the Glover Report. National Park status would provide many economic benefits such as tourism which will last long after the building works end.

**Included files**

**Title** The Housing Strategy

**ID** EGS4489

**Person ID** 1264395

**Full Name** R Jane Dickson

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The assumed number of additional houses required is far too high and out of line with more up-to-date figures.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4520
<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>The Housing Delivery Strategy 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. 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> </ol>

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.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4572
<b>Person ID</b>	1145918
<b>Full Name</b>	Mr Richard Tregoning
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The growth statistics are totally flawed. The needs of housing cannot be overall 30%to DBC and 55 % to Tring in an era of projected 4.7% growth in population across all UK
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4602
<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>The Housing Delivery Strategy comment</b>	The housing strategy needs to be rethought with consideration of how the numbers have been calculated and ways to avoid Green Belt development at Berkhamsted and Tring, taking into account that the settlement hierarchy and housing targets are unjustified. Attention needs to be paid to the growth Berkhamsted has already experienced since the last census and that fact the this proposal seems to be setting a target of well above the expected population growth rate.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4607
<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>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>• BK07 Lockfield is a semi rural location within the village of Northchurch</li> <li>• I have significant safety concerns regarding the potential of building on Lockfield. The exit from this area is dangerous, there is a poor sight line, a blind spot south of the bridge, the bridge itself is single track and there are frequent incidents, near misses and accidents because of it, the road is narrow near the site and can be speedy as people accelerate away from the central village location. Exiting by car from this site would therefore be hazardous</li> <li>• More so exiting as a pedestrian raises even more safety concerns as there is only one very narrow pavement across from the Lockfield site making it particularly difficult for children or people with disabilities to use safely.</li> <li>• Congestion is high on this road at school times, rush hour and weekends. The proposed addition of another 120 cars would exacerbated this</li> <li>• Even in the pandemic adn lockdowns high levels of pollution have been measured</li> <li>• New Road which is the road alongside Lockfield is semi rural. Animals such as deer and foxes are frequently seen on the road, even escaped horses</li> <li>• Lockfield provides wildlife corridors north to Ashridge and east/west along the Grand Union canal</li> <li>• The Grand Union canal is bordered by a chalk stream in this area, chalk streams have international significance, any additional builds or changes in the road could irrevocably damage its ecosystem</li> <li>• Lockfield is in Green Belt, there are no exceptional reasons for boundaries to be reviewed and irretrievable and unnecessary change must be prevented</li> </ul>

- The view across Lockfield to the Chilterns (AONB) is beautiful,
- Building density locally is currently 10 homes per hectare, the building proposal for Lockfield is 27+ homes per hectare
- There is no amount of mitigation work that can compensate for the destruction of this habitat
- The single track bridge would make access to Lockfield challenging for construction traffic and the potential for bridge damage would be high
- The narrowness of road and pavement does not lend itself for any obvious cycle paths
- New Road has been identified as a problem for its congestion and pollution for some time. DBC recognises this but failed to see through the link road between Tunnel Fields and New Road
- Ensuring developers stick with their agreement to bring enhancements promised is a concern - in New Road alone there is no link road and a ravaged ancient hedge from illegal access from new houses
- The amount of usable land at Lockfield is questioned, Railtrack uses this site currently and has access to the railway line, there may be pollutant issues as a result of their long term use of this site
- The portal of the railway tunnel impinges onto more land and there is no retaining fence
- There are no main drains north of the canal bridge, there is a gas hub on the edge of Lockfield, electricity is over ground and telephony is copper wired, this area is not urban in any sense
- All the above add to a cost for the developer
- NFWS identifies Lockfield as medium risk of flooding
- The hedge bordering Lockfield and New Road is productive, animal tracks, significant bird song and butterflies are in evidence
- The Glover report identifies that planning needs to consider those living nearby AONBs and their views. This is Northchurch's best feature, its view. Any building of BK07 and BK06 would effect my beautiful view of the Chilterns and the semi rural idyll of Northchurch
- BK06 Darrs Lane has been proposed for building even though archaeological investigation and Habitat Regulation assessment have not been completed, the selection of Darrs Lane in the planning proposal is as a result premature. Buffer zones would also need to be considered to protect its ancient woodland
- The proposal to allow 200 homes and a secondary school on this site with access to be from Shootersway is frankly ridiculous. Shootersway is a country B road and the impact on nearby roads accessing these homes and a large school would be devastating. The idea that public transport services will be improved to provide suitable access is a triumph of hope over experience. 200 homes means 400 more cars using Shootersway, plus parents dropping off children at the beginning and end of the school day.

**Included files**

**Title** The Housing Strategy

**ID** EGS4615

**Person ID** 1264467

**Full Name** Michael blastland

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4632
<b>Person ID</b>	1264482
<b>Full Name</b>	RICHARD FROST
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I object most strongly to the building of large numbers of new houses in the Dacorum area.</p> <p>The Government instructions to local authorities are badly flawed and out of date. The changes brought about by the Covid disease mean that there will be vast swathes of land with shops and offices in town centres which will no longer be needed. These can be developed into low cost housing over the next few years and would be more than enough to cover housing needs and will avoid the need to build in the countryside. In addition, the government should be doing more to actively encourage people to move away from the overcrowded South East of England . Stop pandering to the developers who want to cover the whole of the countryside with houses so they can make lots of money.</p>

The case of Bulbourne Cross is a perfect of example of a developer trying to deceive people into thinking that their horrible development is good for the environment and wildlife. They are only in it for the profit. Their bizarre promise to build “ hedgehog hotels “ really demonstrates that they have no understanding of wildlife and countryside issues at all. They even seem to suggest the new residents will be keen to cycle everywhere, and that the traffic in Berkhamsted Town Centre will not increase. This is utter nonsense.

One of the main problems in the Dacorum area in particular is that there is only a limited supply of water here. We are already drawing more water out of the ground than is sustainable. Unless some provision is made to import water from other parts of the country this plan to build many more houses will cause severe water shortages in the near future.

The plan to build houses just above the canal off New Road Northchurch with access on to the narrow B4506 and narrow old canal bridge will create a very, very dangerous junction on a very busy road.

More houses means more traffic, more accidents , more pressure on schools, doctors and other services. More large scale development in Dacorum is not sustainable.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS4635

**Person ID**

1264483

**Full Name**

Peter and Miriam Yarrien

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

I have reviewed the Proposals for Development published by Dacorum Borough Council in the Emerging Strategy for Growth document with particular interest in those applicable to Tring, as I have been a resident of the town for almost 26 years. I shall refer to your document as the “Plan” in my comments below.

I believe that any development requires to be done in a manner that fully involves the local communities and provides that community with the housing and other facilities that it needs giving full consideration to their input. Any development should be managed to conserve our countryside, flora & fauna by using “Brownfield” sites first, and not developing Greenfield sites unnecessarily. Across this country there is a huge amount of Brownfield land that should be redeveloped preferentially to using Greenfield sites wherever possible. All new development should be specified to use sustainable materials and maximise energy and water conservation.

**Housing Growth:** I find it difficult to believe that the Plan intends to increase the amount of housing in Tring by 2,730 dwellings by the year 2038, this represents an increase in excess of 50% of housing stock over current levels. The majority of this development being planned for current Green Belt and AONB areas. This total includes the “Roman Park” development that is already well advanced on the Icknield Road to the West of Tring. The associated increase in population I estimate at being of the order of 6,100.

The Plan bases the future housing requirement on housing projection data published for the year 2014, but this data is now out of date and reference to the Office for National Statistics (ONS) Housing Projections data for 2018 (latest available) indicates that for Dacorum borough the projection for 2038 has reduced to just under 71,000 (from 80,000 projected in 2014 data). Based on the ONS data this suggests that the target for new housing in Dacorum should be reduced by more than 50%. The ONS 2018 data indicates that Dacorum currently contains 64,811 houses. Further, I would suggest that the DBC target figure may require additional revision when the March 2021 Census results are available. The Plan needs to be urgently reviewed and revised based on the latest projections, since the housing target obviously impacts all aspects of the Plan.

Based on the “target” for housing of 2,730 in Tring that Dacorum Borough Council (DBC) are proposing, I do not understand why it should be that Tring which currently contains around 8% of the Boroughs housing stock should be required to accommodate a disproportionate 16.5% of the proposed new housing, especially since this is mostly planned as development on current Green Belt & AONB land. I would expect that when the target numbers are re- evaluated DBC will issue a revised distribution plan, which will maximise use of Brownfield sites within Dacorum, before proposing the use of Green Belt and AONB land and make an overall reduction on the impact in the Tring area to much more manageable numbers, in line with current distribution.

**Green Belt and AONB Land:** The Council has a legal duty of protection for Areas of Outstanding Natural Beauty. By revising the number of additional houses required in line with the latest ONS projections and giving full consideration to Brownfield development first, in line with the NPPF, the Plan should only consider Green Belt and AONB land when all other avenues within Dacorum are exhausted.

To develop such land would appear to be in contravention of both Dacorum’s own Plan (Section 19.11) and National Policy. Further, the Council should note that The Chilterns Conservation Board submitted a request to Natural England for designation of the area as a National Park. This has the strong support of the Government commissioned Glover Report (2019) “Landscape Review” and it is not unreasonable to assume that the AONB in the Tring area is included in the designation. These considerations should be accommodated within the DBC Plan.

The Plan does not appear to have demonstrated the case that “Exceptional Circumstances” exist for the use of Green Belt and AONB land. The NPPF section 11b states that the need for housing and other uses needs to be objectively assessed and that the application of this framework for policies (NPPF) protects areas and assets of particular importance which includes Green Belt & AONB land. The need for additional housing on its own does not qualify for “exceptional circumstances”.

**Included files**

**Title** The Housing Strategy

**ID** EGS4640

**Person ID** 1264486

**Full Name** JIM JEFFERSON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I am writing as a resident of Berkhamsted in response to the draft Local Plan Consultation I wish to register my objection to Dacorum’s strategy for the following reasons:

- This is an unnecessary grab at Green Belt land. The Government has recently changed its national policy towards the Green Belt, quote "Protecting the green belt is a priority and our national planning policy reinforces regenerating brownfield sites and prioritising urban areas. Spokesperson for the Housing Ministry.
- The area encompasses acres of farmland and beautiful countryside and will damage the setting of the Chilterns Area of Outstanding Natural Beauty.
- The proposals call for far too many houses in this semi rural area. An area where there are already too few local jobs which will push the already overloaded commuter arteries even closer to breaking point.
- The Local Housing Plan will overwhelm Tring and Berkhamsted putting an even greater strain on services where they are already stretched for example the utilities, doctors surgeries and schools.

**Included files**

**Title** The Housing Strategy

**ID** EGS4644

<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>The Housing Delivery Strategy comment</b>	<p>The Housing Strategy is based on a flawed vision and unjustified housing targets. It fails to maximise growth in existing urban areas in Hemel; fails to recognise changes in working patterns (post Covid) and a reduction in the population (post-Brexit).</p> <p>It identifies the green belt as providing opportunities for expansion particularly in south and west Berkhamsted, and I wish to object strongly to the inclusion of any green belt land in the plan, when brownfield sites and mixed use development in existing urban areas remain underexploited.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4646
<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>The Housing Delivery Strategy comment</b>	I agree that more housing and especially more affordable housing is needed in the UK. But Berkhamsted and Tring are not the right places and they will not be able to support the number of houses planned.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4648
<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>The Housing Delivery Strategy 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>

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?  
Please think again and at the very least extend the consultation.

**Included files**

**Title** The Housing Strategy

**ID** EGS4650

**Person ID** 1264487

**Full Name** Mrs Sue Edmanson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

Q2 See above re. concern over proposed 2700 new homes in Tring .

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 provision of schools, infrastructure and also leisure facilities and also issues regarding Health Care. Concern regarding potential impact on local surrounding areas of Outstanding Natural Beauty and areas of Scientific Interest.

**Included files**

**Title** The Housing Strategy

**ID** EGS4665

**Person ID** 1260080

**Full Name** Anne Mills

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>You will be aware that we have been asked to put in writing to you any objections to the Dacorum Local Plan for Tring and the proposed 3000 houses on green belt.</p> <p>I strongly object to this plan. Those who have drawn up this plan clearly do not live in this small market town and do not understand the already stretched resources trying to cope with the current population.</p> <p>Local roads will not cope with the increase in traffic – most households have 2 cars – this means a further 6,000 vehicles using local roads.</p> <p>Doctors, schools, shops are already oversubscribed.</p> <p>Moreover we are so concerned that our little market town will be ruined, lose its precious character and become just another dormitory town with no new vernacular buildings.</p> <p>If you could be aware of my objection, I would be very grateful.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4673
<b>Person ID</b>	1264490
<b>Full Name</b>	PENNY COASE
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS4676
<b>Person ID</b>	1264494
<b>Full Name</b>	AMANDA BEAMON
<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>The Housing Delivery Strategy comment</b>	<p>I am writing to express my concerns about the proposed developments in Northchurch. They are as follows:</p> <ul style="list-style-type: none"> <li>- The number of houses proposed across the borough as a whole is far too high, given that the current infrastructure is already struggling and plans to support this are inadequate</li> <li>- The need to build on valuable green belt has not been proven. It's is essential for the physical and mental health of current residents, but more importantly it has been designated greenbelt for a reason - we are living in a huge climate crisis and developing precious green land will only exacerbate this and is deeply irresponsible</li> <li>- there are already significant road traffic issues in the area</li> <li>- the individual identity of Northchurch has been completely overlooked</li> </ul>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4679
<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>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4693
<b>Person ID</b>	1264498
<b>Full Name</b>	TIERNAN GODEL
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>I feel it necessary to respond and request this development be halted because like everyone else in Northchurch we love our rural setting and our village and want to keep it the way it is.</p> <p>In the main, my objections are -</p> <ul style="list-style-type: none"> <li>- The over all number of houses proposed - 16,899 across the borough — is just not justified by the latest statistics on projected population growth.</li> <li>- Massive development in Tring and Berkhamsted will cause gridlock in Northchurch High St as well as the 400 houses earmarked for Northchurch itself. Bear in mind the high street in more normal times is already exceptionally busy. This will add more cars on the roads creating further disruptions and have an environmental impact on the air quality.</li> <li>- The grounds for encroaching on the Green Belt have not been made out - the law says we can only build on the Green Belt if it has proven to be necessary - this is simply not the case!</li> <li>- Insufficient value has been put on the Green Belt both in terms our mental and physical wellbeing and the impact on climate change</li> <li>- Northchurch has been written out of existence - it is being subsumed into West Berkhamsted. We feel a strong affinity to the area and wish for it's existence as a separate entity to remain.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4703
<b>Person ID</b>	1264499
<b>Full Name</b>	JENNIFER GUINOT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>The Housing Delivery Strategy comment</b>	<p>I feel it necessary to respond and request this development be halted because like everyone else in Northchurch we love our rural setting and our village and want to keep it the way it is.</p> <p>In the main, my objections are -</p> <ul style="list-style-type: none"> <li>- The over all number of houses proposed - 16,899 across the borough — is just not justified by the latest statistics on projected population growth.</li> <li>- Massive development in Tring and Berkhamsted will cause gridlock in Northchurch High St as well as the 400 houses earmarked for Northchurch itself. Bear in mind the high street in more normal times is already exceptionally busy. This will add more cars on the roads creating further disruptions and have an environmental impact on the air quality.</li> <li>- The grounds for encroaching on the Green Belt have not been made out - the law says we can only build on the Green Belt if it has proven to be necessary - this is simply not the case!</li> <li>- Insufficient value has been put on the Green Belt both in terms our mental and physical wellbeing and the impact on climate change</li> <li>- Northchurch has been written out of existence - it is being subsumed into West Berkhamsted. We feel a strong affinity to the area and wish for it's existence as a separate entity to remain.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4711
<b>Person ID</b>	1264500
<b>Full Name</b>	GARY AND HEATHER FRIEND
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>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</p>

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** The Housing Strategy

**ID** EGS4717

**Person ID** 1264503

**Full Name** DAVID MAULE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am a young student that lives on the edge of Dacorum and certainly knows the area well. I am currently studying a BSC horticulture and after hearing the plans for development in my local area shocked me massively. Currently studying a module on sustainable development I have been researching lots of modern practices of development, and it really concerns me that the council are not choosing the most sustainable way to build houses in the local area. With a world that is in such a climate crisis every detail that goes into the planning, must be heavily thought through and must bare in mind the future generations and the future of planet earth.

60% of Dacorum is green belt land and that is what makes the area so special. Why choose to build on green belt and destroy more land and habitats when there are unoccupied brownfeild sites that have the opportunity to be built on as well. Why ruin something perfect, and that is needed in this time of climate crisis, when you have other opportunities. During lockdown, and after restrictions lifted, the places you are planning on building on were flooded with people and that is because during lockdown people assed what really matters and they all came to the conclusion that outdoor spaces are key to a healthy lifestyle. Everyone knows that a walk around nature is vital for our mental health as a species. So why are you ruining it? DEFRA has calculated that 2.1 billion pounds could be saved by our government's and councils on mental health support if everyone is exposed to mother nature on a local walk. As your plan ranges from 2020-2038 you will be developing past a critical point for the environment. As I am sure you are aware the UN have already stated that the earth has 12 years left till a point of no return and that was released in 2018! The government have also pledged for 30% of the UK to be given back to nature by 2030. Do your plans consider those statistics? Have you incorporated

any green infrastructure or renewable energy sources in your design plans? And finally what about all the extra people that will be on the roads, in the shops, and using services like dentists and hospitals. Where will they all go?

When affordable houses are needed and schemes such as 'help to buy' are required why are you building large family homes in places families are unlikely want to live?

Growing up in this area I wish to stay here. However that is highly unlikely with the types of houses you are building. In a world of division why make the gap larger between rich and poor when you are the people who should be helping everyone?

I hope you take this seriously and think carefully through every aspect of your plans for the future generations that will live here and for the environment.

**Included files**

**Title** The Housing Strategy

**ID** EGS4718

**Person ID** 1264485

**Full Name** Charlotte Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment** This section has been created with a faulty vision. The housing target is unjustified and has flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of green belt. Also fails to take into account post pandemic working practices.

**Included files**

**Title** The Housing Strategy

**ID** EGS4725

**Person ID** 1152420

**Full Name** MICHAEL AND PENNY WEBSTER

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>Dacorum's proposed increase in housing stock by some 25% up to 2038. Is this an over-provision?</b></p> <p>Dacorum's proposals to build an extra 16,596 houses on about 2000 acres of Green Belt, seems to have been arrived at on the premise of HM. Government's previously communicated requirements which have now been withdrawn because of its recognition that this will inevitably adversely impact on the Green Belt and open spaces in SE England. The South East has in the meantime been provided with the Government's lower housing targets based on estimates for the Office for National Statistics (ONS) made in 2014 which would equally apply to Dacorum. Since then the ONS has produced figures in 2018 which, I understand, would result in the housing needed in the next 17 Years to be about half the annual increase suggested by Dacorum. One wonders why, therefore, Dacorum has not significantly reduced its targets to align its housing needs more to those recommended by ONS. The proposals to level up the country may also involve a reduction in the growth of jobs in the South East with a corresponding boost for those in the North.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4740
<b>Person ID</b>	1264510
<b>Full Name</b>	Martin Evening
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I object to the housing numbers that have been proposed in this consultation. The government must be challenged on the numbers put forward.

Why are outdate ONS figures of 730 dwellings being used, when applying the algorithm increases it to 1023 dwellings per year?

Clearly these are out of date figures. The latest ONS projections for Dacorum is 355 houses per year. Applying the algorithm to this latest number, this would suggest that the maximum figure for our housing target should be 497 dwellings a year.

This inflated target is in large part responsible for the huge amount of Green Belt that is put forward to be released for housing as part of this Local Plan and will provide an overprovision of housing in the area. The current proposed plan promotes building nearly 17,000 new homes within our borough of which 60% is Green Belt, meaning the houses will be built right up to the boundaries of the Chilterns AOB. This will have significant impact on the special biodiversity we have in Dacorum.

The Council has failed to take account of the National Planning Policy Framework, paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constrains including the impacts on the Green Belt and AONB.

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.

**Included files**

**Title** The Housing Strategy

**ID** EGS4743

**Person ID** 1262625

**Full Name** Katie Guest

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>It is completely confusing for me to understand why a council who say they are against loss of Green Belt Land have presented a proposal which includes a huge loss of Green Belt Land!</p> <p>If there is nowhere else to build to meet the numbers other than Green Belt land then we have to challenge the numbers. I understand that they are overstated anyway, so we have to push back. The Green Belt cannot be sacrificed! We need it for human health as well as for health of the environment and wildlife. Let's see what numbers can be reasonably built on brownfield sites and use that as the path forward, while at the same time reviewing the latest population growth numbers given a declining childbirth rate and impact of Brexit. And make the plan much more realistic and palatable to residents of Dacorum.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4761
<b>Person ID</b>	1264515
<b>Full Name</b>	SUZANNE JAMES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>As a resident, I implore DBC to reconsider this plan which proposes massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt 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 therefore critical that land is not lost to unnecessarily development.</p> <p>I am not against housing and especially building affordable homes, it is the sheer volume of housing and loss of countryside, community with the lack of planning, I object to in this proposal. We are custodians of our environment and countryside, for future generations, as my Grandparents were. It would be catastrophic to lose all this precious countryside on our watch, as it can never be replaced.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4762
<b>Person ID</b>	1264515
<b>Full Name</b>	SUZANNE JAMES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The figures for the amount of housing throughout the whole of Dacorum, appear incorrect. The Council is using outdated (2014) housing projections. The overall number of houses proposed throughout the Borough - 16899, is just not justified by the latest statistics on projected growth. There is also the question that these houses will be executive and there will be small number for social housing.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4763
<b>Person ID</b>	1264515
<b>Full Name</b>	SUZANNE JAMES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy comment</b>	Loss of Green Belt land and the impact this will have on mental and physical wellbeing. The ability to walk from your house, without using a car to a green space, is vital for wellbeing as well as the environment. This was illustrated during this past year during lockdown. Personally, as a Northchurch resident the countryside by the A41 and the fields by Bell and Darrs Lane, prove to be so important during this time. Not forgetting, these areas have an abundant array of wildlife and I believe, ancient woodlands. It would be a travesty to build over this. I would like to remind DBC that the Law states we can only build on Green Belt land if proven necessary - this does not appear to be the case in this proposal. I also remember when the A41 was proposed, these green corridors would be left, undisturbed, as a "green lung" absorbing emission from the A41. The proposed number of houses to be built on Brownfield land in the existing urban areas of Hemel Hempstead, Tring, Berkhamsted and Kings Langley and not on Green Belt land and the Chilterns AONB.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4774
<b>Person ID</b>	1253595
<b>Full Name</b>	Ian Lindsey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>DBC is being stupid to increase housing at all in DBC; the Council should have the guts to tell the Westminster Government to (content removed) and build new homes in the North of England, the Highlands of Scotland as well as North Wales.</p> <p>DBC is already over-populated and congested. These proposals are quite simply barmy. If the Government wants to 'even-up' the economy, there should be no new homes built South of Yorkshire and Lancashire. Business will follow the workforce.</p> <p>DBC proposals will make a bad situation even worse.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS4786
<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>The Housing Delivery Strategy comment</b>	The target number of houses is not clearly justified. New dwellings are required but the plan misses opportunities to develop on brown field sites
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4791
<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>The Housing Delivery Strategy comment</b>	Again, I refer to the fact that events have overtaken your plan, and business interests need to be readdressed in the light of the pandemic's effects. More brown field sites need to be identified.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4801
<b>Person ID</b>	1264522
<b>Full Name</b>	Louise 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>The Housing Delivery Strategy 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). 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>

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

I call for:

- The number of new houses proposed in the plan to be substantially reduced.
- Dacorum to implement a local plan that includes firm and ambitious sustainable commitments. I believe all new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.
- I call for the 40% minimum affordable homes objective to be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
- Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, each new major development area.
- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.
- The Local Plan should allocate land for new allotments for 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. The Local Plan must prioritise this.

**Included files**

**Title** The Housing Strategy

**ID** EGS4816

**Person ID** 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> * Yes * No	Yes
<b>The Housing Delivery Strategy 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 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.</p> <p>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> <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.</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**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4819
<b>Person ID</b>	1264529
<b>Full Name</b>	MARGARET AND JOHN INGRAM
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>As residents of the Historic town of Berkhamsted for over 40 years we do not want large developments on green belt land which will over load the facilities of the town.</p> <p>Do we NEED these houses</p> <p>This is not environmentally friendly.</p> <p>We cannot stop progress but what about small developments of homes for local people that are affordable, and social homes with affordable rents. Hopefully these would not over load the utilities.</p> <p>Traffic on the High street has already increased to early the amount it was before the A41 bypass was built. We do not want traffic jams.</p> <p>School are already full, and Medical care in the town has had to be rearranged with the increase in population in the Shooters Way development.</p> <p>We enjoy walking in our beautiful local surroundings, without having to get in the car and drive a distance, and would like local residents to be able to do so in the future.</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4842
<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	Yes
<b>The Housing Delivery Strategy comment</b>	The town of berkhamsted already has significant issues in terms of volume of traffic trying to navigate small congested roads which spread from the main high street. Road safety for children and cyclists should be a priority and most senior councillors acknowledge the road network could not sustain increased traffic flows. This would cause unprecedented congestion a lack of supporting facilities and destruction of green belt.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4854
<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>The Housing Delivery Strategy comment</b>	There is a focus on the Two Waters area mentioned - however with the current infrastructure and no feasible plans for improving this, it seems that this area should not be seen as one of the primary ones for residential development. Areas around the Maylands would be better suited for this level of development.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4899
<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>The Housing Delivery Strategy comment</b>	I entirely support the detailed comments and calculations submitted by BRAG in response to this policy. I also support the inclusion of all the proposed housing in the strategic urban extension of North Hemel in the current plan - 5,500 homes - so that 'Phase 2' is incorporated in the current plan and housing provision.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4900
<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>	
<b>Yes / No</b> * Yes * No	Yes

**The Housing Delivery Strategy comment**

The NPPF is good enough to protect national housing targets yet falls short on the impact on local settlements. In this case Dacorum Villages suffer from demands on all sides, commuting from London and being a point in an over-burdened transport system that cannot cope with current demands. Undoubtedly more new homes are needed and I fully support the right types of homes delivered in the right places. I do object however to the over development of homes that are built on Green Belt sites that maximise developer/builder profitability whilst not actually fulfilling a social need. Kings Langley suffers from traffic demands between HH and the M25 Access to Watford hospital in a safe period of time would be impossible within 20mins if there were to be any issues on any of the major local roads - M25, A41, A505 - With the proposed 10% increase in the Village homes on the Rectory Farm site, traffic will be slower and the consequent risk to life will increase.

Green Belt 'release' is a total misnomer and simply allows developers to increase profits from building more expensive homes with lower costs associated with 'new' sites rather than potential increased costs associated with refurbishing brownfield grounds.

I disagree entirely with the draft Policy SP26 – Delivering Growth in Kings Langley. In particularity I have a strong objection to the proposed “major urban extension” at Rectory Farm (Site KL02) for around 145 dwellings and public open space. Any further consideration of increased urbanisation on other Village sites (Wayside Farm, Hillside Farm and Shendish) is also vehemently objected to on the grounds of Green Belt incursion and no exceptional circumstances having been provided.

The destruction, NOT 'release' as it is described, of the Green Belt will be to the detriment of everyone currently living in the Borough and this should not be allowed. Further space for housing can be delivered through .1. Building upwards and creating greater community spirit in more closely bound social groups, 2. Conversion of retail premises that are rapidly becoming available 3. Brownfield sites that have not yet been found nor listed in the DBC register

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS4957
<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 * Yes</b>	Yes

* No	
<b>The Housing Delivery Strategy comment</b>	<p>The strategy is based on unsound numbers and therefore SP4 is wrong- the ONS numbers from 2018 should be used which result in a projected requirement of around half the 16596 numbers currently outlined.</p> <p>In addition the council needs to make developers actually deliver on their promises for affordable housing, rather than reverting to more profitable larger homes at the final stage</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5006
<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>The Housing Delivery Strategy comment</b>	<p>The Borough is being browbeaten into catering for housing numbers based on fantasy rather than the actual needs of residents. The council should refuse point blank to 'release' Green Belt, which was designated primarily for the purpose of preventing the coalescence of settlements, which is now more likely to occur. Increasing the height of property will be severely detrimental to towns like Tring and Berkhamsted, which are characterised by two-storey heights. Massive new developments, paying no regard to the way these towns have grown by small incremental steps, will turn characterful places into bland dormitory settlements.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5009
<b>Person ID</b>	1264554
<b>Full Name</b>	Mr Malcolm Allen
<b>Organisation Details</b>	Chairman

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ol style="list-style-type: none"> <li>1 The Berkhamsted Branch Committee of the SW Herts Conservative Association welcomes the opportunity to analyse the DBC Local Plan and its supporting documents and acknowledges the complex, detailed work that has been put into the plan by consultants, council officers and elected officials.</li> <li>2 However, <b>we oppose the Plan on the grounds that there are too many houses and they are in the wrong places especially on the south Berkhamsted ridge</b>. Further, the evidence in the supporting papers does not support the numbers or locations and there is no evidence to justify a 31% population growth and no plan for an infrastructure to support this growth.</li> <li>3 The amount of information in the Plan and its supporting documents is beyond the capacity of many individuals to analyse, especially given the communication restrictions of Covid-19.</li> <li>4 During the time that it has taken to develop the Local Plan the UK has encountered not only the Covid-19 pandemic which will devastate world economies for many years, but also we have left the EU with many of the implications of this decision still not understood. At the very time that you are calling for responses to the Local Plan, the vast majority of the UK government's policies are having to be re-assessed and of course that must include Housing Policy.</li> <li>5 It seems inevitable that the number of new houses required to be built in Berkhamsted until 2038 will be different from the figure currently driving the Local Plan. It is almost certain that the massive negative effects of these unexpected national and international issues on the UK economy will require fewer houses. The Plan is still based on 1023 houses per year in Dacorum.</li> <li>6 Although the Government has re-affirmed the 300,000 figure for new houses per year across the UK, the Housing Secretary has announced that he is removing the rule where 80% of housing would be in London and the South East and shifting it to Urban and Brownfield sites in the Midlands and the North. Not only this, but he has yet to amend his policy to take any account of the effects of Covid-19 in such areas as GDP, household income, employment and commuter journeys.</li> </ol> <ol style="list-style-type: none"> <li>1 We agree that Berkhamsted urgently needs a progressive, living Local Plan to guide our decision makers. However given the unusually high level of uncertainty at this time, we recommend that we <b>do not</b> continue to focus all this information on a single target for new houses, but work to evolve a plan contingent on the levels of new houses which will be required as the new government policies emerge in the next few months.</li> </ol>

### **Unanswered Questions.**

- 1 We have concentrated mainly on the plan for Berkhamsted and have searched through many of the Evidence Based supporting documents and have concluded that the evidence does not adequately support the quantities and chosen locations of the proposed new houses.
- 2 What causes the rise in population that requires the increase in housing from 9430 in 2019 to around 12000 in 2038?
- 3 Where are the jobs for the projected increased population? The Topic Papers identify Hemel for expansion but state that Berkhamsted will lose 1,375 offices and 1,062 industrial offices.
- 4 We agree there are few opportunities for 'densification' given Berkhamsted's topography except for 'windfall sites' but the chosen sites are not suitable.
- 5 Nowhere is there a plan for the increased transport and travel facilities which will be generated by the new houses in south Berkhamsted. There is a wish list of measures that would, supposedly, improve through traffic but there is no analysis of their benefit or cost or any recommendation for their implementation. There will be thousands of more car journeys on roads that are the main pedestrian routes to four schools.
- 6 There is no specific analysis of Shootersway which will bear the brunt of the proposed new houses and just a brief mention that there is one sole access junction on to the A41 which would be a major cause of excessive congestion. Such detailed analysis is essential when all the figures indicate a substantial rise in car commuting in this area.
- 7 There is a mention of a school around Darr's Lane/Bell Lane which appears to serve the houses to be built in Blks 6 and 7 and to serve the houses there and along the ridge. Children in the 850 houses in Blk 01 would have to walk a long distance along Shootersway onto Darrs Lane or Bell Lane without a pavement in parts. There is no clear indication as to why this school is here.

### **Conclusion.**

- 1 The lifestyle changes which will be created by Covid and Brexit mean that the Local Plan has unavoidably been overtaken by events of such magnitude that its focus on a single target for new housing cannot be sustained. Even using the information and studies that are the basis of the Plan we have severe doubts that 630 houses along the South Berkhamsted Ridge and the 260 houses in Blks 06 and 07 (Darrs Lane and Lock Field) are needed or are in the right places. Indeed 850 dwellings south of Swing Gate stretches the imagination. Further, the topographical limitations of Berkhamsted will mean the development will adversely affect the road, rail and public transport facilities as they stand. It is doubtful if the planned expenditure to improve through routes and encourage cycling and walking will have any marked benefit, even if it were guaranteed which it is not.
- 2 In the light of the above and the scale of the implications of the current Government's major 'rethink' we suggest that the wealth of DBC data and knowledge, including the responses to this Consultation, is reshaped from a single target plan into a series of linked sub-plans contingent on the results of the new figures as they are announced in the next few months. This reshaping will have the great benefit that it will provide the total envelope for the possible new policies plus allow greater agility and speed to implement the new requirements as they are announced.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5015
<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>The Housing Delivery Strategy comment</b>	Over 16,000 houses are proposed across the borough before 2038 (922-1023 annually). I understand that this projected requirement is based on outdated Office of National Statistics/ ONS numbers from 2014 and that if the 2018 ONS numbers are used the projected housing requirement almost halves to a maximum of 536 houses annually. Is this the case? If so then it will allow the government will take advantage of the plan's overprojection and impose a relatively higher proportion of housing on Dacorum than other home county areas.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5028
<b>Person ID</b>	1264492
<b>Full Name</b>	Corinna Rogers
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy comment</b>	<p>Firstly this consultation is unwieldy and difficult to navigate. It is also not clear how to respond effectively so I hope this comment is in the correct area. I strongly object to the seemingly ludicrous housing target stated here for many reasons. It is in noones interest to lose green belt land and the target figures should be reduced in order to avoid doing so. Secondly I live in an area where we are walking distance from several primary schools and 3 secondary schools and yet there is a fight for places in these oversubscribed schools. How can so many new households be accommodated? Recently we have had localised flooding around new developments in the area, what safeguards are being considered to ensure that this volume of building won't exacerbate the problem? How will Hemel Hempstead cope with the additional traffic involved? Currently if there is any closure on a main route there is an immediate standstill of traffic, often making it hard to impossible to get from Apsley/Cornerhall across to the leisure centre area. Someone needs to take another look and come up with a more reasonable number.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5029
<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>The Housing Delivery Strategy comment</b>	<p>Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5036
<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>The Housing Delivery Strategy comment</b>	<p>I think it is highly questionable whether so much new housing is needed in Dacorum. The ability to work from home during the pandemic has led to many people moving out of London, freeing up many homes in London. Home working is also likely to mean that there will be less demand for housing in the London area in the future.</p> <p>Secondly, surely by far the greatest housing need in Dacorum is for homes which are genuinely affordable. This includes the need to make existing family-sized homes become affordable for those with families. I also wonder whether there is a need for appropriate housing for older local people to downsize into. I know of family-sized homes in Dacorum that are under-occupied as they are home to older individuals or couples. I also know of young families crammed into flats, unable to afford a larger home.</p> <p>Regarding the North Hemel Growth Areas, I see that Phase 1 involves destroying the most scenic land out of the two areas and your plans for it include building a household waste site right on the edge of an Area of Outstanding Natural Beauty! I feel that the land in the Phase 1 area ought to be part of the adjoining AONB. If you insist on doing any building in these "Growth Areas" I think it should be on the least scenic part of the land which is on top of the hill.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5053
<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	Yes

* No	
<b>The Housing Delivery Strategy comment</b>	The housing strategy should reflect the vision given in question 1.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5082
<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>The Housing Delivery Strategy comment</b>	In Berkhamsted we need starter homes and affordable housing for our younger residents. We need housing stock within walking / cycling distance of the town centre amenities. In this plan we are being provided with dominantly detached and semi-detached homes that extend urban sprawl, will lead to more road use (and poorer road safety for our school children and residents), and are more likely to be occupied by incomers to the area than local people. The plan simply does not provide what the Town wants or needs.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5087
<b>Person ID</b>	1264555
<b>Full Name</b>	Rick Freedman
<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>The Housing Delivery Strategy comment</b>	<p>The number of new homes required to be built is not substantiated by reliable objective evidence. The housing target should be set at a level between the predicted local requirement (MINIMUM) and the level at which national housing targets would be required without central government influence to direct house building to under-supplied areas as promised in its manifesto (commonly known as "levelling up"). The latter is a developer-driven target, and is based on where the large national development companies stand to make the most reward by producing homes in locations that will deliver the most profit on sale, rather than the homes the residents of the UK need.</p> <p>The housing target needs to be higher than the minimum to encourage developers to invest in house building projects in the borough, but it does not need to be so high that the sizes of projects prevent smaller developers from competing. In addition, it does not need to be so high that large areas of green belt protection are removed from the outset.</p> <p>The current level of house building in the borough far exceeds the ONS predictions for local need (based on 2018 data). If this local need is further uplifted for the "affordability factor" to achieve national housing targets from 2014, this target is still lower than the current rate of building in Dacorum.</p> <p>As such, I strongly support a plan that would seek to preserve the current level of building; and which uses evidence of challenges this level has caused over the last 3 years with methods to mitigate these. This would also allow us to better allocate targets between windfall and development projects, thus allowing us to be confident of a true need when releasing green belt protections.</p> <p>HOWEVER, current housing projects are again developer-lead. This means larger homes, to attract affluent people from outside the borough to settle here, are the standard offering in Berkhamsted, with the "affordable" tariff achieved by providing a large supply of very small, but still extremely expensive, retirement units. This means the land area required per new home is much higher than it needs to be if we adopted planning methodologies currently popular in Europe. Higher population density but with formal and protected green amenity spaces and wildlife/access corridors. Our plan can be more aggressive at getting more houses into a smaller footprint that has been delivered in the last decade.</p> <p>FURTHER to type of houses, homes to accommodate local need MUST be included in the plan. The level of social houses across the borough, at 7.5% of the total is too small, and an offering of starter homes, truly affordable for salaries of 30 year olds (or younger) should be required. Young people should not be forced onto the housing waiting list or out of the borough, when there are so many people moving into the area. We must provide options.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5152
<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>The Housing Delivery Strategy comment</b>	The strategy is based on unsound numbers and therefore SP4 is wrong- the ONS numbers from 2018 should be used which result in a projected requirement of around half the 16596 numbers currently outlined. In addition the council needs to make developers actually deliver on their promises for affordable housing, rather than reverting to more profitable larger homes at the final stage
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5176
<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>The Housing Delivery Strategy comment</b>	What is meant by 'affordable' housing is unclear. What is missing in Dacorum is Social Housing. I do not see lots of homeless people in Dacorum. I am not convinced there is a shortage of actual housing. What seems to be the problem is the expense of the housing stock. Building more privately owned housing stock seems to be meeting the needs of those building houses, the developers, not those who need housing in this area. Those who need housing in this area need low cost housing, which they can rent securely, and not have the burden of paying for repairs etc.... While also not fearing suddenly being given 2 months notice that their home is no longer their home. Which I have witnessed happening in this area many times. Thereby uprooting struggling families from their community.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5206
<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>The Housing Delivery Strategy comment</b>	<p>The strategy is based on unsound numbers and therefore SP4 is wrong- the ONS numbers from 2018 should be used which result in a projected requirement of around half the 16596 numbers currently outlined.</p> <p>In addition the council needs to make developers actually deliver on their promises for affordable housing, rather than reverting to more profitable larger homes at the final stage</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5219
<b>Person ID</b>	1262647
<b>Full Name</b>	Carolyn Wallis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Housing Delivery Strategy comment</b>	

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5233
<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>The Housing Delivery Strategy comment</b>	I wish to strongly express my serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. The Plan also fails to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5257
<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

**The Housing Delivery Strategy comment**

**Policy SP4-Delivering the Housing Strategy** is an important policy in determining the level of growth and the location of sites to be allocated and developed.

We note that the draft plan sets out that it will deliver a minimum of 16,596 net additional homes across the Borough over the period 2020-2038. This equates to a delivery rate of 922 dwellings per annum (dpa).

As stated in our introduction, the BSG will seek to support DBC with their plan for growth. That said, it is fair to acknowledge that there remains a degree of uncertainty as to what the final housing target will be, as during this plan process, it is possible that the final annual housing target, may change upwards or downwards, for a variety of reasons.

In considering the delivery of homes, the NPPF requires that planning authorities make every effort to meet the housing needs of an area and we support DBC with this aim.

Since the DBC draft plan was produced and issued for consultation, DBC will of course be fully aware that there has already been a change to government guidance on housing numbers. In the government response to the local housing need proposals in “changes to the current planning system” published on 16 December 2020, housing targets should now revert to the previous “standard method” and the consequence of this if applied, would be that the housing growth for DBC area would be a minimum of 1,023 dwellings per annum. This would in turn increase the minimum number of homes target from 16,596 to 18,414 net additional homes over the period 2020-2038. DBC will no doubt reconsider Policy SP4 having regard to the above and the implications for other policies within the draft plan. If this higher level of growth, were to be taken forward by DBC, it would simply serve to reinforce the appropriateness of the allocation of sites BK03 and Cy04.

We are also aware that despite the new government guidance and the current content of the current draft plan for consultation, that there is considerable local opposition to development and to green belt releases in particular. We support DBC with their balanced approach to date and trust that they will continue to follow government guidance on housing numbers.

We anticipate that in order to continue to remain in line with the most up to date government guidance that DBC might decide to propose an increase in housing numbers at the next stage of the draft plan. It is worth reflecting that at one stage in late 2019, DBC were intending for the draft plan to be based around housing growth of 1,025 dpa as stated within their public newsletter, which was released at that time.

It is also just worth noting that before that, in September 2017, DBC produced a first draft plan for internal Cabinet, which it had intended would proceed to consultation. At that time, DBC were intending to propose a lower housing delivery of 756 dpa based upon previous guidance at that time. In that draft plan, the front section only of Haslam Field was a site that DBC were intending to recommend as a housing allocation. DBC had therefore concluded, based upon all their evidence base work at that time that the front section of site BK03 should be allocated as a housing allocation even at that much lower level of growth.

For many reasons that we have stated in our previous consultation responses and will state throughout this one, it is clear therefore that whichever level of growth is considered and finally adopted, that the allocation of the BSG land BK03 for housing is the most appropriate green belt release in Berkhamsted.

We acknowledge that as stated in **Policy SP4** that DBC will look to the redevelopment of previously developed land and urban sites but we consider this requires a careful balance. The local economy also needs employment and to protect its character. Town cramming/loss of employment uses should not just simply be promoted or assumed to be a better choice, than an appropriate green field, green belt release of site BK03. The release of BK03 will enable delivery of many local infrastructure and wider community benefits and it is important to note that it is the worst performing GB site (see later responses).

As a very long-established local practice of Chartered Surveyors, Aitchison Raffety are aware that a number of the potential brownfield allocations for high density redevelopment within the current draft plan are on sites which are simply not available. Some have perfectly viable tenants and long leases and will not come forward for viability/operational reasons. These sites should be excluded from the housing numbers and if this was the case it would remove many hundreds of dwellings from the DBC supply assessment. These wrongly perceived numbers nor significant numbers from unknown windfall allowances, should not be used as part justification by those opposing green belt releases to seek to avoid the release of a poorly performing GB site, such as BK03, given the short-term benefits that will flow from it. In our opinion, only brownfield sites, where it is known that they will come forward, should be included and an appropriate buffer should be included in the final delivery numbers to allow for the very high probability that a good proportion of them will not. To do otherwise is pure speculation in our view.

Since the draft plan was released for consultation there has also been revised consultation on other possible permitted development linked to the economic issues facing retail use and town centres. However, it should be acknowledged that town and local centres continue to have an extremely important community role to play. The opportunities for housing are limited due to many practical and legal constraints and the possibility of some additional housing from this source should not be over-estimated, nor used as a reason to prevent the allocation of highly sustainable green field land, such as BK03.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5266
<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>The Housing Delivery Strategy comment</b>	The total of new houses proposed is far too large for this area. In particular to propose nearly 6,000 new homes in greenfield areas will transform the nature of many areas of natural beauty and are completely unnecessary.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5323
<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>The Housing Delivery Strategy comment</b>	The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5351
<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 * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The strategy is based on unsound numbers and therefore SP4 is wrong- the ONS numbers from 2018 should be used which result in a projected requirement of around half the 16596 numbers currently outlined.</p> <p>In addition the council needs to make developers actually deliver on their promises for affordable housing, rather than reverting to more profitable larger homes at the final stage</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5386
<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 * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>No green belt, green fields or amenity greens should be built on before all the brownfield sites have been built on. I'm of the view that, that many houses may not be needed with Brexit and Covid likely to impact the population / life expectancy.</p> <p>Are the two hundred homes needed in Grovehill? Isn't it big enough already? If these homes are the ones ear marked for the Marchmont Fields; why haven't they been built already if they are needed? Also to make the area more diverse, whilst I am of the view that truly affordable homes are most needed overall; in areas such as Grovehill, it should be more expensive homes that are built, to provide diversity and bring the area up.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5396
<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>The Housing Delivery Strategy comment</b>	This is a depressing read.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5425
<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>The Housing Delivery Strategy comment</b>	This strategy is not backed up by data and needs to be revised in light of new data around projected housing need. It has not taken into account the impact of the pandemic on releasing land within Berkhamsted for development, instead of developing Greenbelt. The sites proposed are too small to deliver a significant number of houses meaning there are multiple sites (particularly along Shootersway) that will lead to significant transport congestion and overloading of infrastructure. This housing strategy has also not taken into account the increase in housing already provided for by the development at Bearroc Park.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS5459
<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>The Housing Delivery Strategy comment</b>	This strategy should be revisited in the wake of Covid 19 and the legacy effects on society on the subject towns and larger villages in terms of vacant commercial / retail properties. Is there demand for these in the near future society?
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5460
<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>The Housing Delivery Strategy comment</b>	There is a real danger that Dacorum will become a borough ruined by such a rapid rate and huge increase in the number of houses at a time when residents are also having to come to terms with huge damage and change created by the HS2 development and climate change and environmental blight. It is so important to respect our countryside - we cannot get it back.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5549
<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>The Housing Delivery Strategy comment</b>	<p>Long Marston currently has a serious flooding problem, the one in one hundred years event has happened 5 times in the the past 20 years since I have lived in the village, twice in the past year and due to global warming is becoming more frequent. Our sewage and drainage system is unable to cope with heavy rain and needs updating and replacing. Attempts by Thames Water to remedy this have consistently failed so to build new houses and place additional pressure on an already failing and stressed system would clearly be irresponsible until this failing infrastructure can be replaced or repaired. There is currently a proposed development in the village on land adjacent to Loxley Stables - a field that the Environment Agency has recommended be retained as a soakaway. As SUDS will not work where the water table and saturation levels are so high, clearly it would not be advisable to build on this land and certainly not a major development of 14 houses which includes 9.33 meter high blocks of flats and maisonettes which would tower over existing homes plus 5 three storey town houses. There are only two two bedroom homes on this proposed development, despite the fact that there is a known shortage of small family homes in the village for our young people who want to start a family and send their children to the village school. There is a very limited bus service and no shop in the village. It is not suitable for elderly people therefore or young single people as there are so few facilities, so building flats and maisonettes is frankly pointless and out of character with the village. What is required is small, sustainable family homes with gardens. However, Dacorum must be aware of the very serious issue of flooding in the village which is seriously impacting on our quality of life. Until the failing infrastructure can be replaced or properly repaired, whatever the cost, this village will continue to be at risk and not a suitable place for such a development. it is sincerely hoped that Dacorum will recognise that it has a duty of care to the residents of Long Marston, however desperate the current developer is to proceed, and despite the fact that he professes to have such a 'good relationship' with the Dacorum Council, having approached other landowners in the village and told them as much, we trust and hope that the well being and safety of residents will come first and that in the event that our infrastructure is eventually renewed, any future developments will fit in with the village and be of a suitable size and provide the type of housing we need and retain trees and hedges and our village pond, all of which the proposed development threatened to destroy.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5599
<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>The Housing Delivery Strategy comment</b>	<p>As mentioned previously:</p> <ol style="list-style-type: none"> <li>1) Use of outdated (2014) numbers and algorithm. DBC needs to challenge this.</li> <li>2) Building on Greenbelt land, which is illegal.</li> <li>3) Lack of public transport/cycle ways.</li> <li>4) Topography of the area - it is hilly, meaning there are issues with water/sewage etc that have been outlined by CBRE Hertfordshire.</li> <li>5) Infrastructure - valley setting, no improvements to public open spaces, no plans for additional congestion/pollution.</li> <li>6) No additional health services planned to deal with the increase in housing numbers. It is already hard to get a GP appointment, what will happen if these houses are built?</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5609
<b>Person ID</b>	1264682
<b>Full Name</b>	Claire Green
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>We should not be building on greenbelt land. It is there to protect the green spaces in built up areas so that local people can enjoy it, food can be grown locally, animals and plants can share our locality, views are preserved, air quality is enhanced, and population density is constrained.</p> <p>Greenbelt land by definition should only be built on in exceptional circumstances. The need to build more housing is based on outdated population projections which are being reviewed.  <a href="https://www.thetimes.co.uk/article/doubts-over-botched-population-data-used-to-justify-housebuilding-fln35w9c">https://www.thetimes.co.uk/article/doubts-over-botched-population-data-used-to-justify-housebuilding-fln35w9c</a>) It is estimated that 1.3 million foreign workers have left the UK during the COVID-19 pandemic  <a href="https://www.thetimes.co.uk/article/state-cash-is-no-substitute-for-wealth-creation-wbfdk8ckz">https://www.thetimes.co.uk/article/state-cash-is-no-substitute-for-wealth-creation-wbfdk8ckz</a>) and immigration levels will be dramatically reduced due to the new points based immigration system. House-building targets will be adjusted accordingly in due course as this flows from population projections. All plans to build on greenbelt land should therefore be put on hold immediately. There are no exceptional circumstances to justify building on greenbelt land.</p> <p>We are currently facing a climate change emergency, alarming and law-breaking levels of air pollution and catastrophic biodiversity loss. It is therefore beholden on those in positions of power to protect the remaining green spaces we have. This is especially true in the Southeast of England, which is already overpopulated, over-polluted and has suffered from massive loss of biodiversity in the last few decades. Building on greenbelt land has to stop now. Once greenbelt land has been built on, we can never get it back. That's why we need to preserve it. It's no use talking up environmental concerns and pouring money into environmental schemes if we are destroying natural land and habitats at the same time.</p> <p>The government's levelling up agenda means that investment in housebuilding should be focussed on the North of England, rather than the already prosperous and over-populated Southeast of England. Hertfordshire should be focussing on supporting farmers, saving quality local farmland, reducing pollution, meeting our climate change responsibilities, halting biodiversity decline, and saving our ever-diminishing countryside for the benefit of our communities.</p> <p>Local councils exist to serve the local people, not impose top-down rules imposed by remote central government bodies. As a county, we should be standing up to rules that impose additional housing and arguing against them, not weakly accepting them. If we have to have more housing, it should under no circumstances be built on greenbelt land, but should be created from brownfield sites, repurposed office/retail space and other more inventive solutions.</p> <p>The future of housing is not building on our precious greenbelt. It is through repurposing high streets into mixed residential, retail and entertainment spaces. It is through rethinking empty office space that will never go back to pre-pandemic levels. Our beautiful borough of Dacorum should be leading the way on this, showing how we can build homes that people want in thriving city and town centres, not by building over our wonderful countryside.</p>

The development of proposed site Tr01 is of particular concern as it will destroy the beautiful landscape on the main entrance to the town of Tring, surrounded by the Chilterns Area of Outstanding Natural Beauty.

Irreparable harm would be done to the unique character of the historic market town – which must be preserved for current and future generations.

A new major road junction is proposed for the already totally unsuitable Cow Lane and at least two new major road junctions are proposed onto the London Road. These will cause serious environmental harm - congestion, noise, air pollution, etc - for all of Tring's residents, businesses and visitors.

These new access points are exclusively on the east and south of the proposed site, thereby limiting journey options and causing indirect journeys and congestion.

Tring is relatively traffic free - this is a much appreciated aspect of the town - and this would be lost forever if Tr01 is developed.

The public right of way across the farms is currently of enormous recreational benefit to numerous walkers {including many dog walkers}, joggers and families. If the farms are built upon, local residents in eastern Tring will be deprived of this much-loved amenity and their wellbeing will suffer. There are no suitable local alternatives.

The farms are a strong wildlife link between Tring Park and Pendley Manor and contain an important Local Wildlife Site. Conservation of our local wildlife heritage is of critical importance.

**Included files**

**Title** The Housing Strategy

**ID** EGS5610

**Person ID** 1262957

**Full Name** Gregory Hukins

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	Since the local plan was initiated the proposals for planning reforms have been revised. the announcement by the government in December 2020 suggest that there should be a shift to brownfield urban sites in the West Midlands and northern England away from rural and semi rural communities in the South East. Also that the government would prioritise brownfield sites in Englands 20 largest cities and other urban areas, as these were the most environmentally sustainable sites. This is where new funding will be targeted, up to £67 million to brownfield developments in the West NMidlands and Greater Manchester which will be served by HS2. A new £100m fund will be launched giving councils accross England the chance to pitch for money to support developments on public land and regeneration of council estates.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5619
<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	Yes
<b>The Housing Delivery Strategy comment</b>	Dacorum's housing development has already exceeded targets. There Plan makes no case for future development without recognising the exceeded targets are part of the Plan.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5626
<b>Person ID</b>	1264698
<b>Full Name</b>	Ellie Moskalik
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I object in the strongest terms to both the volume and location of proposed housing development outlined. The infrastructure of the area cannot possibly sustain such an increase in occupancy, not to mention the impact on the environment, green belt, and volume of cars, noise and general overcrowding it will create.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5630
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5660
<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>The Housing Delivery Strategy comment</b>	There are many buildings in hemel and the surrounding areas that, with work, could become safe, sustainable places to live why we are expanding rather than fixing I do not know. This will not help this will make our problems larger!
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5674
<b>Person ID</b>	1264720
<b>Full Name</b>	Harriet Knight
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I believe that the housing plans for Tring Western are disproportionate and will have an irreversible negative effect on wildlife and the environment, damaging the life experience of existing residents and visitors as well as adding to environmental damage at a time when the preservation of the natural world is at the forefront of local, national and international strategy. The new housing is not sufficient affordable, nor is there provision for sufficient amenities to support the new population
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5710
<b>Person ID</b>	1258030

<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	Yes
<b>The Housing Delivery Strategy comment</b>	<p>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.</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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5723
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5730
<b>Person ID</b>	1264726
<b>Full Name</b>	Annie Heaton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>Based on wrong projection of housing needs:</b> 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.</p> <p>Furthermore, the draft Plan takes <b>no account of the impacts of Covid and Brexit</b>, 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. I would fully support an appeal by DBC on the numbers.</p> <p>If these numbers are to be substantially revised, then both the proposals to release Green Belt for development, and comments received during this consultation, are not be relevant to the actual proposals that DBC would in future make. Indeed this public consultation process may be rendered invalid, and a new Local Plan subject to a further public consultation <i>of the same status</i> as is being conducted in Feb 2021.</p> <p><b>Ensuring sufficient affordable housing:</b></p>

When considering the housing plan for Dacorum, the Local Plan's primary objective should be to ensure that the need for affordable homes is reliably strengthened, whilst also ensuring that the present and future need for new homes is met.

Yet there are not sufficient plans to ensure affordable housing within the strategy. Some 7000 people are on the housing list in Dacorum on a recent count. The pandemic is only likely to increase this number. Current house prices mean that only the highest earners among young people can hope to buy a home in Dacorum at present unless they have significant financial support. And this need is likely to increase as the local population grows. The Local Plan does not provide sufficient information about specific programmes to ensure access to affordable housing, even for the for example by providing new homes via housing associations whose mission is to make affordable homes available to those who need the support. Building large numbers of new homes alone may increase supply, but given that 28% of homes are bought by people moving out from London according to a recent Hamptons survey [Hemel Today, 29 December 2020], there is insufficient evidence that this will bring house prices down to affordable levels for those who need it.

**Included files**

**Title** The Housing Strategy

**ID** EGS5743

**Person ID** 221837

**Full Name** Mr Robert Wakely

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am opposed to the draft Housing Strategy which would mean the sacrifice of greenbelt land principally to deliver excessive profits to developers. The Housing Strategy needs to be genuinely designed to meet the needs of this community, in particular:

- I am opposed to the development of any green belt land until all other available sites have been fully utilised. Green belt development should only then be allowed to meet the need for social housing for people who are completely unable to afford to either rent or buy here currently

- a thorough reconsideration in light of the pandemic of future need and demand for commuter housing, for reduced commercial and retail property in town centres, with the potential for the increased availability of town centre residential property
- increased provision of sheltered and extra care housing for older residents
- increased provision of 1 and 2 bedroom flats for younger residents
- commitment to a thorough assessment of the infrastructure needs of each community and active planning to meet those needs ahead of further development
- all future development to be subject to strict environmental and sustainability standards, including low carbon energy provision, limiting traffic growth and enhancing road safety.

**Included files**

**Title** The Housing Strategy

**ID** EGS5769

**Person ID** 1264697

**Full Name** Nicholas Wood

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I refer you to my responses, but in short; your housing need assumptions are not fit for purpose.

UK housing needs have changed beyond all recognition since the 2016 Brexit vote yet you continue to use outmode baseline assumptions.

In January the government funded ESCoE was reporting that 1.3m, EU residents have left theUK post Covid and Bank of America is forecasting no net employment growth from 2019 levels for the foreseeable future in London. They will not be returning in anything like the numbers of the last decade as the Government revamps its immigration strategy. Home working is decimating office rents and homeshopping is decimating the high street. Old style commuter towns like Tring and Berkhamsted are not going to see anything like the need for expensive houses designed to commute into London that they have for the past decade yet you continue to plan like it 2014! The planning framework suggests that green belt should only be released ' in exceptional circumstances', but nowhere in your Draft Local Plan do I see up to date proof that those circumstance exist, particularly for Berkhamsted and Tring.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5821
<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	Yes
<b>The Housing Delivery Strategy comment</b>	Are the proposed number of new homes supported by evidence for population growth? Any development in Tring should concentrate of providing affordable housing for our children, and not swathes of executive style dwellings.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5823
<b>Person ID</b>	1264751
<b>Full Name</b>	Simon Strong
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The Local Plan does not sufficiently protect the value of the Chillterns Area of Outstanding Natural Beauty (AONB) and the Chillterns Beech Woods. The plan underplays the impact of the proposed developments on these areas..

The number of new homes that are proposed is in excessive of confirmed need and appears to be "developer-led". The impact of this level of development, particularly on the smaller towns of Tring and Berkhamsted, is grossly excessive.

**Included files**

**Title** The Housing Strategy

**ID** EGS5836

**Person ID** 1264752

**Full Name** Chris Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

Table 2 [P37] shows 5945 houses being built on 'Strategic greenfield Growth Areas' viz Green Belt of which around 1870 are allocated to Berkhamsted. These cannot be considered 'sustainable sites'; the further critical issue is whether it is desirable to impose 20% plus growth on a small market town that already has severe infrastructure limitations as well as being constrained by proximity to AONB, Beechwood SAC etc

The council have failed to take account of NPPF, para 11, footnote 6 which allows local authorities to restrict the scale of development owing to other planning constraints including impacts on the Green Belt and AONB.

Housing need should be based on the most recent and relevant data , which is currently the 2018 based ONS projection, not the 2014 ONS data which the council is basing its calculations on. This is no longer relevant and even less so post pandemic when people need to work/live in different ways.

**Included files**

**Title** The Housing Strategy

**ID** EGS5863

**Person ID** 1264768

**Full Name** Paul Shepherd

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Too much
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5899
<b>Person ID</b>	1264757
<b>Full Name</b>	Danielle McGlynn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Careful thought should be given to not overdeveloping our beautiful towns and villages.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5920
<b>Person ID</b>	1264774
<b>Full Name</b>	Barry 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>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5932
<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>The Housing Delivery Strategy comment</b>	This has been extremely poorly thought through. In particular, post pandemic working patterns have not been taken in to account. Otherwise, the thinking appears to be target-led rather than taking a common sense approach.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5970
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS5997
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6004
<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>The Housing Delivery Strategy comment</b>	The housing strategy is driven by a faulty vision, settlement heirarchy and unjustified and outdated housing targets. It has failed to maximise growth in urban areas at the expense of the Green Belt.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6022
<b>Person ID</b>	1264822
<b>Full Name</b>	JULES GARNER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy comment</b>	The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. The only solution would be to extract additional water from the chalk aquifer causing further damage to the local chalk streams. Chilterns has 9 of the chalk stream habitats and the siting of housing will intern degrade these special places.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6040
<b>Person ID</b>	1145998
<b>Full Name</b>	Mrs Pauline 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>The Housing Delivery Strategy comment</b>	Homes for families are not flats in high rises. Hemel families need homes. No tall bui;dings to depress everyone and become future slums , focus on the character of the surroundings.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6055
<b>Person ID</b>	1263050
<b>Full Name</b>	Nichola Hickey
<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>The Housing Delivery Strategy comment</b>	<p>I consider that a 55% increase in housing in Tring as overdevelopment and will have an effect on all existing infrastructures and resources.</p> <p>It will affect many different areas in particular:</p> <ul style="list-style-type: none"> <li>• Traffic</li> <li>• Healthcare resources - we are struggling now with Doctors' appointments at the surgeries!</li> <li>• Tring station - access and parking availability. Street lights need to be put on the dark lonely road to the station together with drainage! it is totally unsafe for lone females in the dark! Better pavement and surface for pedestrians and cyclists - it is so dangerous!</li> <li>• Addition of pedestrian crossings to the town</li> <li>• Schools - they are oversubscribed now. Where are the children going to go?</li> <li>• Parking near schools - where as these houses are away from the main town?</li> <li>• Who is the housing for - Affordable housing for youngsters trying to get on the ladder? What is the mix?</li> <li>• Local community will be spoilt as Tring is a lovely small town.</li> <li>• Impact on Wildlife/areas of outstanding beauty - hedgerows and trees</li> <li>• Air quality affected</li> <li>• Green spaces in Tring disappearing</li> <li>• Local parks and parking</li> <li>• No banks</li> <li>• Post office that seems to open when it feels like it</li> </ul> <p>Tring doesn't have the capacity to deal with a 55% increase in housing and will totally ruin our lovely market town. It is a small town for a reason!</p> <p>If we wanted to live in a large town we would have chosen to live in Aylesbury or Hemel Hempstead.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6060
<b>Person ID</b>	1264846
<b>Full Name</b>	ROSEMARY ASHFIELD
<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>The Housing Delivery Strategy comment</b>	<p>My husband and I have viewed with horror Dacorum's Local Plan for housing development on green belt land to the east of Tring for 2731 houses in Grove Fields and even more development on the site of the present fire station, auction rooms and museum in Brook Street. This comes on top of the Roman Park development currently being built on green belt land to the west of Tring consisting of approximately 200 dwellings. Houses for sale are in the £600,000 to £800,000 price range with no sign yet of the 40% affordable housing required on a site of this size.</p> <p>The next proposed development in Brook Street involves the demolition of the fire-station, auction rooms, lower part of the market car park and "re-location" to a site, as yet unspecified, of the Tring museum. This museum was part funded by a lottery grant and public donations and provides a vital link with Tring's charter as a market town granted many centuries ago. It stands in an historic location, next to where the old cattle market once stood, with easy access and parking and is a valuable asset for both tourism and local schools.</p> <p>More development has been applied for in two former historic bank buildings in Tring High Street which more latterly housed "Restaurant 23" and "Lussmans" after the banks closed down. Both of these restaurants closed in the pandemic. Plans for number 20 (ref 20/03858/LBC) are for 3x 2 bed-roomed flats, conversion of strong room to a 1 bed dwelling and a 2 bed dwelling in grounds to the rear. Plans for 23a (20/02977) are for change of use to 3 ground floor offices and 2x2 bed-roomed flats. Plans for 23b (ref20/2978/LBC) are for 3 new 2 bed-roomed mews houses. My question is where is the parking for these proposed new developments as they have little rear access?</p> <p>Other developments have taken place in the historic heart of Tring – 12 dwellings in Dunedin Court off Akeman Street on what was the site of small workshops and more houses off Langdon Street on the site of a haulage yard. More houses off Aylesbury Road on the site of the old Francis House School. Three mansions have appeared facing the Miswell Lane Recreation grounds on what used to be Osington School playing fields. On Bulbourne Road four more palatial dwellings on fields next to Gamnel Farm and on Station Road the demolition of the old health centre and nurse's accommodation allows still more housing in Nightingale Court.</p> <p>Beaconsfield Road which has been our home for the last 45 years was a pleasant mixed development of mostly 1930's detached houses, semis and bungalows. Sadly every detached house or bungalow which comes onto the market is</p>

demolished and two more take their place. The last two 5 bed-roomed properties were marketed in excess of £800,000. and a planning application is currently in place for the demolition of number 55 and the erection of 2 semi-detached. These houses are largely not affordable for the lower paid and reduce the housing stock of bungalows to meet the needs of the elderly. I would like to know if houses constructed in Tring, or given planning permission during 2020, are to be deducted from the required number of new dwellings?

Moving on to the demolition of two farms on the A41 to provide yet more housing, a potential school and new employment, it is hard to see how making farmers redundant can benefit the rural economy. Likewise the new road planned between Station Road and Bulbourne Road together with the vast number of houses planned for Grove Fields will further decimate the green belt and the wildlife which flourishes on the chalk down-land. Currently some of these fields are flooded so how are Dacorum proposing to “reduce flood risk and flooding issues?” Has a geological survey been carried out in this area?

Tring clearly needs more affordable housing for our key-workers and the lower paid who cannot afford to buy or rent in the town but not more of the high end properties which are currently being built. The infrastructure of the town is inadequate to cope with such a huge increase in the population and we see no Delivery Plan of what is needed. By playing an “enabling role” over the past years Dacorum have reduced such facilities across the board. Changes have been as follows:

Fire, Police and Medical Services

Planned demolition of the existing fire station which has served Tring well for many years.

The police station is closed and we have only one policeman and two community officers.

Health Services: The Health Centre which used to provide excellent pre and post natal care, classes for expectant mums, inoculations and child development, sight and hearing tests has long been closed and the land sold for building.

Doctor’s surgeries: We have two surgeries, both administered by Rothschild House with inadequate parking and only one disabled parking bay each. These surgeries also serve the surrounding villages. It is extremely difficult to get an appointment and you will rarely be seen face to face, waiting instead for a telephone consultation. Home visits have long since disappeared.

Hospitals: We have an Urgent Care Drop-In Centre in Hemel Hempstead ( not open all night) otherwise you will need to travel to Watford, St. Albans or Stevenage.

Rehabilitation and respite care: The excellent unit in Northchurch which enabled patients discharged from hospital to receive care and physiotherapy before returning home was closed some years ago. Hemel Hempstead hospital does have limited facilities, mostly for palliative care and local nursing homes have few beds allocated to the NHS. or Social Services for respite care.

### Leisure Facilities

Tring is blessed with clubs run by local organisations such as the Bowls Club, Cricket Club, Squash Club, Tennis Club etc. and excellent football clubs. What it lacks however is a leisure centre with swimming and gymn facilities at reasonable cost. At present we can only use Tring School's pool out of school hours along with their astro-turf pitch. There is a long wait for children's swimming lessons and most parents will have to travel to neighbouring towns. Likewise private gymn subscriptions are often beyond the reach of the lower paid. We also have few exercise classes for the elderly to keep fit.

There is an excellent library in Tring which sadly has had opening hours reduced over recent years. Judging by the numerous surveys conducted on Library use this too could be at risk of closure and is the only place which offers internet access and guidance for those who do not have an internet connection at home.

### Retail

Dacorum has done little to protect our High Street which presents a depressing picture of closed shops, restaurants and banks. There are no banks in Tring, only one small post-office and one even smaller building society. During the pandemic the queues for both stretched the length of the High Street. We have a large elderly population many of whom are unfamiliar with internet banking and ATM machines.

### Climate Change

Tring's Refuse and Re-Cycling Centre was closed by Dacorum some years ago when we were told we had permission to dispose of our rubbish at the Aston Clinton Centre. I understand this permission has been restricted to those who can

provide documentation that they live in Bucks. Our nearest centre is in Berkhamsted which is small and only open part-time. This inevitably leads to more fly-tipping.

To provide for the expected growth in electric vehicles Dacorum has installed a very few charging points in the Market Car park, Tesco have done rather better in this respect. With regard to renewable energy I have not yet noticed any solar panels being installed on the houses under construction on Roman Park for which Dacorum granted planning permission.

Thames Water have recently contacted Tring residents with regard to the problems they are having in maintaining supply and water pressure at peak times due to increased development in both Tring and Aston Clinton. They have offered advice on a number of water saving devices. In view of this and the variation in weather due to climate change have Dacorum ascertained that water supplies are sufficient?

#### Sustainable Transport and Connectivity

In reply to a query with regard to parking places in Tring during a planning consultation meeting for the Roman Park development we were told that a cycle path would be provided to the town and there was a regular bus service to meet the needs of residents. The 500 bus service is far from reliable being delayed on route between Watford or Aylesbury and ceases altogether after 19.00 hours. There is a limited service on Saturday and no buses at all on Sunday.

You may also not be aware that Tring Railway station is two miles outside the town with very few buses and a cycle lane which is so poorly maintained, badly lit and dangerous with wet leaves, cyclists rarely use it. Parking at the station is also very expensive.

#### Education

Tring has three excellent infant and junior schools and Tring Secondary School (currently undergoing re-construction) all of which have a good reputation. Tring School also serves the local villages and is often oversubscribed meaning pupils do not get the school of their choice and have to make long bus journeys to other schools. I note that you have included possible school building on your development plan but how long will this take? The Roman Park development is going on sale now.

Tring has three private nurseries but none operated by the local authority. Akeman Street Baptist church offers excellent pre-school education but only has limited capacity. More development means more young families with fewer facilities available to them.

#### Elderly Care

We have only one privately run Nursing Home in Tring and three sheltered housing complexes. To live in the sheltered housing residents must be reasonably fit able to fund themselves. Only one of the complexes has a resident manager. The other two have a visiting manager who has responsibility for more than one complex. During the pandemic with community halls closed and visitors discouraged, residents have become extremely isolated and rely heavily on visits from Age UK and telephone calls and visits outside from church volunteers.

We have no day care centre in Tring and the luncheon club has long gone. Meals on wheels are no longer delivered by local volunteers but cooked in bulk and brought by van from Hemel Hempstead. Trings local churches offer lunches or tea and cake on a weekly basis or otherwise the elderly have no opportunity to leave their homes and socialize with others. Obviously this has not been able to take place during the pandemic.

Many of the elderly would benefit from advice and assistance in how to claim Pension Credit, Carer's Allowance, Income Support etc. Sadly the Citizen's Advice Bureau has closed and the excellent Finance Advisors from the County were made redundant several years ago. Claims must be made on lengthy forms and verified with a one hour telephone conversation. Although Age UK assist where they can this process is completely beyond the ability of many pensioners and their entitlements go unclaimed.

Dacorum has failed to deliver on their strategy of "liaising with providers to ensure that appropriate provision is made" with regard to the infrastructure provided in Tring. If the infrastructure is failing now it can only get worse with massive new developments. May I suggest that Dacorum take the opportunity of studying the 2021 census due to take place in March to inform their future plans for Tring.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6067
<b>Person ID</b>	221818
<b>Full Name</b>	Mr Gordon Bluck

<b>Organisation Details</b>	Chairman TASC Berkhamsted Citizens Association
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>1) Unless there is a demonstrable need for the proposed houses this must be reduced to a more acceptable level not just use 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..</p> <p>2) 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.</p> <p>3) 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).</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6074
<b>Person ID</b>	1264850
<b>Full Name</b>	LES WICKS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy comment</b>	<p>Having read the consultation documents related to Tring I believe the report authors have done their best to bury the full extent of the changes planned for Tring - The plan for Tring is incoherent based on the massive growth in housing of 55%, it is inconceivable that any town could accommodate such a rapid increase in population, the damage to the area would not be recoverable and will change the essential character of the town that exists today. The area seems to be disproportionately affected, when compared with other areas across the UK, no explanation is given on how the methodology for determining Dacorum's, Tring's, target.</p> <p>The plan for new infrastructure is weak and points only to major arteries not to local roads and transport links - local infrastructure is weak now the issues will be much worse if the plans for the area from Station Road to Bulbourne is allowed to go ahead without amendment. The plan to improve local employment is at best inconsistent with the growth in number that will live in Tring and at worst makes no attempt at building high value jobs.</p> <p>The approach to wellbeing and exercise is inadequate and fails to take account of the increase in the local population and the age profile of the area - it is quite ridiculous that a town of the size proposed does not have its own sports centre will full size swimming pool, with more indoor courts, and more all-weather outdoor facilities. The plan for walking, cycling and other increasingly popular pastimes is vague at best. We have extensive chalk quarries in the area no plan is made to promote outdoor activities like sailing/ water sports or of increasing use of wildlife areas.</p> <p>This plan, as presented, should be allowed to go forward without further consultation on a more substantiated plan – I hope we can look forward to your support in determining a better, more equitable, more coherent plan for local communities in this area.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6079
<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>The Housing Delivery Strategy comment</b>	If housing is need surely with the changes with the use of office space due to Covid would free up brown field sites for development.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6085
<b>Person ID</b>	1262182
<b>Full Name</b>	Steve Webb
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I have read the document posted on the Dacorum Planning website. I wish to put on record my feedback which, if possible, I would like to see posted on the relevant part of the website.</p> <ol style="list-style-type: none"> <li>1 There are fundamental, conflicting and irreconcilable issues with this Plan. The dictats of Central Government are to a large extent responsible for this in no small measure but I'm still surprised that Docorum Borough Council would proceed with no absolutely no acknowledgement of this obvious fact. In various parts of the report, mentions are made of the importance of attractive landscapes, the climate change emergency, the desirability of sustainable development, countryside representing the least sustainable option, a rich historic heritage etc etc. It is palpably clear that these cannot be reconciled in a plan like this and it is frankly unwise to present it as a plausible set of proposals in such a context.</li> <li>1 The potential scale of development right across Dacorum is quite clearly excessive and disproportionate. There is a housing need; everyone recognises that - we all want our children and lower paid key workers to have access to affordable housing and it is obvious that people need to live somewhere but increasing the size of a small country town like Tring, for example, by 50% cannot possibly be the answer. Planning policy should not be responsible for settlements coalescing in an already congested area of the country. Tring and Tring Station, for instance, will become one partly at the expense of re-designating Green Belt. This simply cannot be justified under any kind of rational analysis - and certainly not one that purports to have long term sustainability at its heart. The scale of development needs to be far more measured than this to avoid existing communities being completely overwhelmed.</li> <li>1 This Plan should be reviewed wholesale in the context of the massive structural changes being brought about by both the rise of the Internet and the impact of Covid 19. For example, large sections of Hemel Hempstead town</li> </ol>

centre are being hollowed out by the changes to property use - in retail, in commercial property, in car parking and a host of other areas. Not all of these changes are bad but they are profound and they need to be properly taken account of in land use planning. Instead of tearing up green fields in sensitive areas, why doesn't the Council take a strategic view, rather than the incremental approach in this Plan? It should consider repurposing large areas of developed land using its compulsory purchase powers. Empty shops, offices etc would be better being demolished and replaced with high density, comparatively low cost residential property. Instead of providing a developers charter to build homes on green belt which those most in need of housing cannot afford, why not build large numbers of homes where they can and should be built as part of revitalising town centres. Dacorum could and should be at the forefront of a move which will inevitably gather pace in the months and years ahead across the U.K. - the current shape of this plan is woefully short of what a more imaginative and relevant approach might deliver.

**Included files**

**Title** The Housing Strategy

**ID** EGS6095

**Person ID** 1154912

**Full Name** Simon Chilton

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

This document is full of "Vision" and "Sustainability" and has aspirations that no-one can argue with but what little detail is presented shows that in the real world these aspirations are not mutually compatible with the number of new houses being proposed. The evidence for this is in the table in paragraph 7.7 page 37 which shows that 36% of the new houses will be on Green Belt land. I have two main comments on the document:

Firstly, the number of new houses being proposed needs to be challenged and reassessed, particularly the number that is forcing the use of green belt land. As the document acknowledges, there have been there have been a number of developments in the last few years that could affect predictions including emerging doubts over the Governments methodology for determining housing needs and its incompatibility with the political drive to boost the north of England and the affect of the Corvid pandemic on working practices and where people want to live.

**Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6103
<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>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6105
<b>Person ID</b>	1264826
<b>Full Name</b>	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>The Housing Delivery Strategy comment</b>	The proposed local plan prioritizes meeting an excessive level of housing need over protection of the Green Belt on the assumption that this is required by national policy This assumption is incorrect. Exceptional circumstances for meeting housing need in full have to be shown, and have not been demonstrated in the consultation documents

The trends revealed by the latest Office for National Statistics (ONS) 2018-based Population and Household Projections are towards a very significantly lower increase in population and number of households to be catered for than that estimated by the Council's consultants, GL Hearn in their updated South West Herts Local Housing Need Assessment (SWHLHNA) 2020, the Council's main evidence document on housing need.

Using the 2018-based household projections and a proposed new national method to calculate need, the Plan calculated an annual additional housing need figure of 922. The latest government guidance still using the old 2014-based projections would result in an even bigger figure of 1,022 a year.

By contrast, using the 2018-based household projections alone produces an annual household need figure of 341. Allowing for a 3% vacancy rate, and for potential past under-provision, I believes a realistic and sound estimate of Dacorum's annual housing need over the plan period is in the range of 351 to 536 dwellings per annum The Council should assess housing numbers for the next stage of the Plan that properly reflect actual observed recent trends in the local population and number of households, rather than slavishly rely on an inappropriate national algorithm that would result in an unsound 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.

**Included files**

**Title** The Housing Strategy

**ID** EGS6136

**Person ID** 1264832

**Full Name** Robert Blencowe

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I note in your document under Healthy Communities you say "While we do not directly provide healthcare and education facilities we will continue to engage with the providers of these services as a part of our enabling role in delivering infrastructure".

I find it remarkable that you are intending to build 16,900 homes with a likely increased population of at least 36,000 and not have developed a strategy for the increased requirements for both healthcare and education. Your wording suggests that you are going ahead with this development irrespective of whether these services will be provided. In other words you are leaving it up to others.

**Included files**

**Title** The Housing Strategy

**ID** EGS6165

**Person ID** 1264030

**Full Name** Sean Collier

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** If there are uncertainties regarding the number of housing, these should probably have been addressed before the public consultation.

**Included files**

**Title** The Housing Strategy

**ID** EGS6168

**Person ID** 1264834

**Full Name** Ilina Jha

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>The Housing Delivery Strategy comment</b>	The Government expects increased windfall urban development in the future due to working practices changing after the current COVID-19 pandemic.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6169
<b>Person ID</b>	1264875
<b>Full Name</b>	Kate Bellingham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The number of homes needed is being stated as a fact. Where have these numbers come from? Will they take into account post-Covid changes which could well reduce the numbers of commuters travelling into London by train? Can these numbers be reduced if/when the requirements change?
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6174
<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

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	There is no attempt to consider alternatives to Green belt development in Berkhamsted and Tring. The housing target is unjustified (as explained elsewhere it uses out of date projections and an unreasonably low windfall projection). Growth should be maximised in urban areas instead of developing Green Belt land.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6181
<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>	Yes
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	The strategy is based on unsound numbers and therefore SP4 is wrong- the ONS numbers from 2018 should be used which result in a projected requirement of around half the 16596 numbers currently outlined.  In addition the council needs to make developers actually deliver on their promises for affordable housing, rather than reverting to more profitable larger homes at the final stage
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6208
<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>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6225
<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>The Housing Delivery Strategy comment</b>	Housing need has not been assessed locally and plans are quantitative not qualitative. Government algorithms have generated out of date targets which are inappropriate in the changed environment post-Brexit, Covid shift in employment patterns, climate emergency statements in particular with regard to water and local population structure.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6234
<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>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6248
<b>Person ID</b>	1264731
<b>Full Name</b>	Graham 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>The Housing Delivery Strategy comment</b>	<p>The Housing Strategy is based on having to supply 16596 houses. Although this may decrease in the light of government reviews I still believe this will represent a higher figure than Dacorum should supply. I do not believe we should just supply whatever is wanted, rather what the area can sensibly support with its quality of environment.</p> <p>In particular the strategy of delivering growth in the small town of Tring at a higher percentage of growth compared with other areas is not appropriate.</p> <p>Consideration of brown field sites around villages has not been considered more carefully as they have considerable advantages.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6293

<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>The Housing Delivery Strategy comment</b>	<p>The housing delivery strategy 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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6300
<b>Person ID</b>	1264919
<b>Full Name</b>	Claudia Bernardini
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Most of the new housing will take the place of green places that are largely used by the local community. By developing these sites the existing community will find their choices of green spaces noticeably reduced in quantity and quality. Thi

will reduce the quality of life of the population who chose to live here exactly because of the location and availability of green spaces.

The additional number of houses and population will add extreme pressure on the local green spaces and the quality of life by increasing the levels of air and water pollution, water extraction and traffic issues.

Despite more suitable sites could be found in the area, the plan will affect the Green Belt and destroy important green spaces and land that is widely used and enjoyed by the local residents.

The fact that this massive development will bring more job opportunities to local construction companies and builders is a very short sighted approach when considering that the developed land will be lost to nature and future generations 'forever' to benefit a few companies that could be better employed elsewhere. The plan prioritises the profit of few above the benefit of the majority.

**Included files**

**Title** The Housing Strategy

**ID** EGS6335

**Person ID** 1145844

**Full Name** Dr and Mrs Melvyn Else

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** In the call for sites in 2017 sites were put forward but have been ignored by the council who have preferred to meet their housing requirements using sites that were previously in the Green Belt. This is not delivering a housing strategy within the framework of the requirements of the NPPF.

**Included files**

**Title** The Housing Strategy

**ID** EGS6349

**Person ID** 1262933

**Full Name** James Cunningham

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The release of green belt land is not justified.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6352
<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	
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6365
<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	Yes
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6366
<b>Person ID</b>	1264924
<b>Full Name</b>	Andrew Sangster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	SP4: I support the locations identified in the plan for expansion in Tring. They have been flagged for a long time and make sense. I do support the growth of Tring, and these do seem to be the best places to focus that growth.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6385
<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	Yes
<b>The Housing Delivery Strategy comment</b>	Again, I believe that the fundamental target figure is wrong and consequently the allocation of 4000 houses to Berkhamsted and Tring and the destruction of the Green Belt is a flawed strategy. Growth should be maximised in the existing urban areas of the borough, not on greenfield sites.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6400
<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>The Housing Delivery Strategy comment</b>	<i>The number of net additional homes to be delivered is too high.</i>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6404
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>My understanding is that the council has used the 2014 based household projections to calculate housing need, but this fails to take account of the National Planning Policy Framework which expects local authorities to use the latest available information. 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 (see CPRE Herts report on the consultation).</p> <p>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>	The Housing Strategy
<b>ID</b>	EGS6409
<b>Person ID</b>	1264906
<b>Full Name</b>	carol nutkins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Whilst I'm happy for Tring to receive additional housing I do not believe there is the extent of need as outlined in this plan. As a market town the numbers of housing suggested will mean it will lose its identity and change its character. Housing numbers need to be reconsidered in light of the changes brought about by the pandemic.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS6434
<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>The Housing Delivery Strategy comment</b>	Please see previous comments
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6437
<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>The Housing Delivery Strategy comment</b>	Far fewer houses are needed in the area than originally planned - the media has been reporting on this and the council now needs to adjust its plans, If you give the OK for all this building on green belt land you will end up with unsold unneeded houses at prices that people who need their first home cannot afford. This is an expensive area and will not help solve the housing shortage.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6439
<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>The Housing Delivery Strategy comment</b>	I do not believe the infrastructure (current or proposed) can cope with the proposed level of housing. The policy is in direct contradiction of national government policy to develop brownfield sites and particularly cities.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6451
<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>The Housing Delivery Strategy comment</b>	The size requirement for new housing is generated by an alogorythm that was pre covid. The world has changed and so has how people live. Retail spaces may become prime housing sites. Building on brown field is always more preferable to building on green field sites and definitely building on green belt. It appears that towns such as Berkhamsted are being penalised by having already used brown field sites for development being forced to build on green belt sites. Development will no doubt continue untilk Tring , Berkhamsted and Hemel are one. There is a sense of ineviabilitly about the Berkhamsted

sites, especially the large south Berkhamsted one, as it was proposed for development before, went to the high court on appeal and reject - and lo and behold here we are again!!

So does Dacorum need all these houses where are the people coming from!! Where is the so called levelling up with jobs being spread all over the country particularly to the north. Obviously building houses in areas which attract premium houses is great for developers but is that true for the rest of the community. Build some social housing and don't then sell it off.

How is our infrastructure going to cope with these houses! Water, sewage, roads, schools, doctors?

**Included files**

**Title** The Housing Strategy

**ID** EGS6460

**Person ID** 1264982

**Full Name** Rachel Heaphy

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** *The number of net additional homes to be delivered is too high.*

**Included files**

**Title** The Housing Strategy

**ID** EGS6495

**Person ID** 1264967

**Full Name** Caroline Kelly

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I object very strongly to the proposal to increase the size of Tring by 55 % through building new homes on green belt / agricultural land . I do not understand how this can be considered to be sustainable as there is already a significant decrease in agricultural out put and will only increase pressure on importing food and tehrefby increasing carbon footprint.</p> <p>Such a significant increase in the size of the town over a relatively short period of time will substantially alter the ntaure of the town turning it from a small market town to something far larger which the plans do not appear to address in terms of teh infrastructur eneeded - water/ sewerage/ power supplied along with the need for additional support services- doctors , police etc. I do not feel that out current 1 GP practice ( in 3 location) and our part time police station are really fit for purpose.</p> <p>Having children born and raised in Tring and also being local myself to the area , I want my children to have the opportunity to live here is if they choose to do so and so I do not disagree with the need for expansion however it must be sustainable and affordable based on wages in this area and not London as can be seen on LA5</p> <p>I also strongly disagree with how the allocation of housing as been distributed across Dacorum. As a town on teh very edge of the borough, it oftern feels that Tring is short changed on services and support compared to other parts of teh borough - and this certianly seems to be true in this case</p> <p>.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6499
<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> * <b>Yes</b> * <b>No</b>	Yes

<b>The Housing Delivery Strategy comment</b>	As covered previously at 4
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6519
<b>Person ID</b>	1264974
<b>Full Name</b>	Catharine Shaw
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The setting of target areas and numbers at this level in the absence of clarity and confirmation of partnerships planning and funding for infrastructure development and housing construction standards that place climate change mitigation and biodiversity conservation AT THE STRATEGIC HEART of the plan from the outset are a deep concern. The only concrete ambition to emerge from the Plan are the numbers and sites of housing development. This is not appropriate - commitments of this kind should only be adopted once clarity is reached with other government and community and private sector partners on how developments will be made with negative net carbon emission impact and negligible habitat destruction. This means transport, construction standards and environmental impact must be considered prior to endorsing sites and numbers. Not after
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6541
<b>Person ID</b>	1264975
<b>Full Name</b>	Jacqueline Horwood
<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>The Housing Delivery Strategy comment</b>	<p>Central government have required many local councils to build a large number of houses to meet the housing need. The need for more housing is inevitable. However the housing strategy which has been put forward by Dacorum council is not a responsible and acceptable way of meeting this housing need. Overall, the plan seems to be a rushed way of meeting quotas with little consideration for other factors.</p> <p>In particular, the lack of infrastructure in Hemel and the surrounding areas to support thousands of extra families and traffic is of huge concern. There seems to be little to no mitigation for the inevitable future pressure on our roads and health care facilities. Hemel Hempstead used to have two hospitals serving itself and surrounding areas. Now, the growing population struggles to access local doctors services and farther away hospitals with long appointment waits and long journeys. Accommodating thousands more homes in this situation is illogical madness and will increase pressure on the already struggling NHS. It is difficult to understand why the previous proposal for a large centralised and easily accessible hospital to serve all the surrounding areas was dismissed. In terms of roads and transport there is inadequate consideration of how extra traffic from new developments will impact congestion as well as pollution. There seems to be no provisions to properly mitigate this.</p> <p>New developments proposed represent a destruction of our local green areas, particularly protected green belt land. This can never be reversed. The council seems opposed to developing existing brown field sites which would inevitably be more difficult, costly and take a longer time to complete. However, this just illustrates how priority has been given to meeting quotes as quickly as possible as opposed to taking a more difficult route which would serve the area and its community better by preserving green space and making good disused and unsightly areas. Building on protected green belt affects local wildlife and impacts community wellbeing. Further, re- classifying greenbelt as potential sites for development whilst ignoring brown field sites shows how local powers can so carelessly and easily ignore it's protected status. Is it really protected land if this can be done?</p> <p>Lastly, since so many houses must be built despite these factors, it would be the thinking of many local residents that at least there will be more housing stock available for younger generations and those who need social housing. Unfortunately, it will inevitably be the case that social housing allocation numbers will dwindle as time goes on and the actual number of affordable houses and council houses delivered will be much smaller than first promised. We have seen this happen with the LA3 development.</p> <p>As such, it is on these grounds that I oppose Dacorum council's strategic plan. Increasing house building must happen, and of course local councils must respond to central government demands. But without the proper mitigation for local infrastructure this plan represents an injustice and disservice to local residents.</p> <p>Jacqueline Horwood and family</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6549
<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 * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I repeat my concerns that the scale of house building in Hemel is excessive for the infrastructure and wellbeing of residents.</p> <p>There needs to be a greater proportion of affordable housing.</p> <p>All housing needs to be built with low carbon targets.</p> <p>Create targets for a minimum distance between frontage and green space - e.g. 100 -200m.</p> <p>Create targets for tree densities, hedgerows, rewilding of green space.</p> <p>Create rewilding of areas on a scale to the green land lost in order to readdress destruction of wildlife habitats.</p> <p>Every planning application needs to take all possible steps to minimise destruction of trees, verges and hedgerows.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6553
<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 * No	Yes
<b>The Housing Delivery Strategy comment</b>	Is this requirement for homes up to date following the exodus of young people, EU workforce and Remainers to Europe, and the large number of deaths in the past year? There is a demand for affordable homes and council homes, but the buffers in this plan with recent trends may lead to some homes not being let and becoming dilapidated.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6560
<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>The Housing Delivery Strategy comment</b>	The Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also it fails to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6561
<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>The Housing Delivery Strategy comment</b>	<p>The insistence on various versions of "affordable" housing is in many ways unrealistic. Tring is and will remain by its very location, surroundings and character a desirable area and thus an expensive one. Younger people wishing to purchase property normally do so by moving to a cheaper area. We and many others did this when we got married many years ago. This is a natural way of populations moving and is very much in line with the government encouraged "levelling up" move to the north. Why else are they building HS2?</p> <p>People want houses of good quality in nice areas - not whatever can be put together on the cheap or made achievable by smoke and mirrors ways of accounting or part only mortgages.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6622
<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 * No	Yes
<b>The Housing Delivery Strategy comment</b>	<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>

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.

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.

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.

The town's services such as car parking in the town centre, GP services, etc cannot accommodate this proposed uplift in the population. No-one living in these proposed sites (other than possible TR01) will walk into the town and will expect to be able to park their cars when they get there.

The enormous growth in population in Tring would significantly increase pollution (noise and fumes) in the town and the surrounding countryside and the AONB.

**Included files**

**Title** The Housing Strategy

**ID** EGS6632

**Person ID** 1265006

**Full Name** Tracy Bownes

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

It appears use of greenbelt has been used as a solution to gap-fill the target number of homes. I do not see evidence in the document that all opportunities to develop brownfield sites or to permit greater infill development of other urban areas. Furthermore, the target should be challenged - there are not "exceptional circumstances" to support the extent of reclassification of greenbelt as proposed by this plan.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6658
<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	
<b>The Housing Delivery Strategy comment</b>	<p>Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target, and exacerbated by flawed handling of windfall projections, thus failing to maximize growth in urban areas at the expense of Green Belt. Also, fail to take into account post-pandemic working practices.</p> <p>Post-pandemic, there are likely to be a lot of commercial buildings and areas which are able to be turned into housing. This can help rapidly reduce the building on the green belt, something that should never have been considered in the first place.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6678
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6685
<b>Person ID</b>	1265043
<b>Full Name</b>	Roberta Migale
<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>The Housing Delivery Strategy comment</b>	I strongly object the proposed number of houses that a flawed algorithm has calculated as needed by Hemel Hempstead. I even more strongly object that any of these house would be build on greenbelt or agricultural land and the beautiful countryside we have. 16900 home would need to accommodate at least 40000 or more people I assume, which means Heme would double the size in the next few years. I don't believe that's a fair representation of what the reality will be, especially in the light of what happened during the pandemic. There will be I predict even less demand for house in places so close to London as more people will work from home and won't need to commute to the same levels as done so far. The population we have at the moment is just about right for the services and space we get in the town. This model which suggest a huge demand for housing I believe will have to be revised in a post CoVid scenario. But never, never involve building on green spaces, we should protect them not destroy them! I would move if Hemel changed as envisaged by this plan.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS6688
<b>Person ID</b>	1261231
<b>Full Name</b>	Bayard Beling Morales
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The projected number of new homes to be built in Hemel Hempstead will cause a major impact on the demand over the infrastructure e green areas in the region, and should be reviewed to consider changes due to covid-19 before any commitment.  Also, it is concerning that green belt areas are to be used on these developments, and as a resident I oppose that.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6716
<b>Person ID</b>	1265062
<b>Full Name</b>	Kev 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>The Housing Delivery Strategy comment</b>	The new development will strip the area of natural beauty and remove so much wildlife. We enjoy nature in the local area and the increase in population, cars and removal of habitat will devastate wildlife
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6718
<b>Person ID</b>	1265066
<b>Full Name</b>	Greta 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>The Housing Delivery Strategy comment</b>	<p>Firstly I have comments on the national housing situation, and secondly on Tring.</p> <p>Why are we discussing Local Plan when the Government agreed in mid-November to rebalance the faulty algorithm, so that there would be more building and more share of the economy in towns and cities in the North, and less building on Green Belt in the South.</p> <p>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.</p> <p>The need for so many houses should be reduced, as 800,000 foreign nationals have left the UK this year, as well as those who left due to Brexit.</p> <p>As a Tring resident, I am part of the thriving community of this small historic market town. The character of the town will change completely with the plan for 2,730 new dwellings, which could mean 8,000 more people.</p> <p>In normal times, Tring Station car park is completely full by 9am on weekdays, so another huge car park would be required at Tring station.</p> <p>Overall my objection is that the unique character of Tring and it's close community will never be the same again, with such a high percentage of new building.</p> <p>Hopefully when the Government change their plans to build in towns and cities on brownfield sites, and convert empty commercial properties, the housing requirements will be much reduced, and rural areas will be able to remain unspoilt.</p> <p>My objections are mainly due to the fact that Tring is surrounded by Green Belt immediately adjacent to the current "built" land. In addition, to the North and East immediately beyond the Green Belt, is AONB land which would suffer severe impact from any extension to the current town boundary.</p>

We must protect our local towns.

**Included files**

**Title** The Housing Strategy

**ID** EGS6734

**Person ID** 1264937

**Full Name** Danny Killeen

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

The loss of Green Belt land is always a concern, as it is a finite resource. IF the country's population continues to grow, then more housing is necessary. 2018 ONS figures suggest the requirement is near half of the 922 stated as an annual requirement in Dacorum. 1m people have been estimated to have left the UK in the past 12 months due to covid (it will pass) and brexit (it will not). Fewer houses are required to house a smaller population, so more research is needed to make sure the housing strategy is right-sized for actual requirement. Changes in requirement for office and retail space in town centres will offer other opportunities for residential development.

Building right to the boundry of an AONB will have a significant detrimental impact on the natural environment.

**Included files**

**Title** The Housing Strategy

**ID** EGS6758

**Person ID** 1265036

**Full Name** Tom Burrows

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	Why do you insist on providing affordable housing and bring down the market value of these areas?!
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6762
<b>Person ID</b>	1265041
<b>Full Name</b>	Alastair Bulloch
<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>The Housing Delivery Strategy comment</b>	<p>COVID has had a radical impact on our work and travel habits. Businesses that have typically had offices are now realising the cost savings of promoting flexible working. This will result in a significant shift of commuter behaviour at the "town" level but significant impact on the overall choice of location that many people (not all, obviously) will want to live.</p> <p>At this stage, it seems prudent to review the planned housing numbers and NOT to commit to such a large increase, favouring an incremental approach instead. It is quite possible that the overall strategy needs to be revised as demand for housing close to London reduces post COVID.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6784
<b>Person ID</b>	1265052
<b>Full Name</b>	Keith Kelly
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The building plan proposed for Tring will double the size of this small market town, of which there will be no return. The appeal of Tring is a small town set within beautiful countryside. This is what attracts people to live and visit the town. The proposal to build these homes on green belt land goes completely against the whole reason for protecting it as green belt in the first place. This is an area of outstanding beauty, there has obviously been a very minimal thought process gone into this scheme, a convenient place to dump many houses and satisfy government numbers. Why is this proposal even been discussed? The government have back tracked on the original plan to concrete over England with the plan now to use brown field and fill in sites to create the housing numbers required. Most of the land that will be used for the housing is actively used for farming crops, has any future sustainability even been considered in this scheme, I think not. The creation of an effectively second town within Tring will require an enormous amount of additional infrastructure, that existing in Tring currently would quickly be overwhelmed. Whilst I don't disagree that some affordable development within the town will be necessary over the coming years, this level of development is far beyond that, shows a very poor understanding of the area as a whole and should be rejected outright on the grounds stated above until a realistic plan for this area can be tabled.</p> <p>I object.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6787
<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>The Housing Delivery Strategy comment</b>	Total failure to take into account urban or brownfield options across the borough
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6825
<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	Yes
<b>The Housing Delivery Strategy comment</b>	The sites identified within Berkhamsted will result in the infill of green open spaces in and around the town, which will destroy the market town. Inevitably the housing provision will be poor quality housing, which combined with inadequate facilities within the town will be a disaster.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6830
<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	
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6845
<b>Person ID</b>	1265061
<b>Full Name</b>	Mark Nethercoat
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I get it regarding the need for there to be an increase in the number of residential properties within and around the Dacorum area.</p> <p>However, the number of properties proposed seems massive, and disproportionate to the requirements for Dacorum. Should the number of proposed residential units be built, there will be massive encroachment into large amounts of Green Belt land, and there will be a massive impact on the areas' infrastructure. There are no reasons to use that level of existing Green Belt areas, that I can see.</p> <p>There are many properties that are currently being redeveloped and change from office / factory into residential (brownfield developments) and this should continue.</p> <p>West Herts CCG has also taken the decision to concentrate and expand upon, the medical facilities in the Watford area - With the 16,000+ new properties planned for Dacorum I'm yet to see that the growth in Dacorum (and similar for St Albans, Watford, Three Rivers etc) has been taken into account for the main hospital proposals.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS6859
<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>The Housing Delivery Strategy comment</b>	I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practice
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6876
<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>The Housing Delivery Strategy comment</b>	I hvae serious concerns about the allocation. We know that the model that the numbers have been based on have been discredited and the numbers that hvae gone into the model are based on old census data. There also hasn't been consideration of long term behaviour change as a result of Covid. There is also development within Green belt in Berkhamsted and Tring, which the plan says it will avoid. I also feel that a national view is not being taken, where we

should be rebalancing growth across the uk, to support the rebalance of north/south investment. We should be considering housing alongside business development, so we are supptiorng development beyond the south east.

**Included files**

**Title** The Housing Strategy

**ID** EGS6896

**Person ID** 1265058

**Full Name** Rick Ansell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** The Strategy is based on out dated numbers. Current ONS figures (2018) are very much lower than the ones used here. The updaed numbers should beused to draw up thestrategy.

**Included files**

**Title** The Housing Strategy

**ID** EGS6908

**Person ID** 403992

**Full Name** Mrs Linda Hill

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6936
<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>The Housing Delivery Strategy comment</b>	I simply do not agree with Policy SP4. It is based on old data and formulae and I do not believe that central government should be forcing Local Authorities to accept levels of development and the types of development in locations which are contrary to the wishes of local people.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6942
<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	Yes

<b>The Housing Delivery Strategy comment</b>	Increasing the population of the Borough by ~30-35% in 18 years with minimal infratruction (in particular transport) enhancements is not sustainable. There will not be enough capacity on the train network, and bottlenecks such as the A41/M25 junction will only worsen further - especially when planned growth in other areas such as Aylesbury Vale are taken into consideration.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS6987
<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>The Housing Delivery Strategy comment</b>	The proposed development in Tring in not wll thought out and shows a complete lack of regard for all the residents that live here. You are nearly extending the size of the small town by a third in size. You are destroying and will continue to destroy all the small towns identity by builing in green zones around their boundaries. In the future the identity of all our small and charming towns will be taken away, at the expense of green areas used by the locals for their wellbeing. Shameful.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7021
<b>Person ID</b>	1265126
<b>Full Name</b>	Mark Bulpitt
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I do not agree with the building of new houses on the green land in the south and west of Berkhamsted. This green land is used by local residents for exercise and well being. Removing this space and building in it will change the character and nature of this area of Berkhamsted that is not the desire of those who have houses and choose to pay the council tax for living in this area. In addition this number of houses will put even more pressure on already over burdened services for the town and its infrastructure. The Berkhamsted GP surgeries are already fully stretched and difficult to get appointments. ashlyn's school is already oversubscribed and road access to all schools result in congestion. The number of vehicles expected alone will increase the risk of traffic accidents, congestion in town and resultant pollution.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7039
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Too late to elaborate.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7055
<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>The Housing Delivery Strategy comment</b>	I have serious concerns about the allocation and how the numbers have been calculated, which amount to a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also, it fails to take into account the Post COVID world and the shift towards homeworking.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7063
<b>Person ID</b>	1265115
<b>Full Name</b>	Anton Jeffes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Housing Delivery Strategy comment</b>	<p>It seems crazy to me to have a deadline of 28th Feb 2021 for this consultation. So many of us are home schooling our children and trying to make ends meet in this pandemic, we have neither the time or the resources to give this matter the due attention it requires and deserves. Is it possible to delay the decision until more people's lives have returned to normal and can give this more scrutiny?</p> <p>I completely understand that housing will have to be built to accommodate the growing demand, but it seems a disproportionate amount is once again being built in the Southeast. Also, Greenbelt land must be protected and not be given up to developers so readily. People will not know what they've got until it is gone.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7075
<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>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7087
<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>The Housing Delivery Strategy comment</b>	Please see comments above. Proposed development in Tring is unjustified and disproportionate.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7105
<b>Person ID</b>	1265134
<b>Full Name</b>	Sandra Bulpitt
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I do not agree with this proposed housing plan- it is the third time in 20 years that Dacorum have tried to build on this greenbelt land. This area and town is not able to withstand such an enormous development of houses as the traffic is already gridlocked in the town centre during rush hour and school rush hour. The local streets have children walking to and from school and more traffic would increase the risk of road traffic accidents up Swing Gate Lane and surrounding streets. The biodiversity will not sustain this development as well as GP surgeries and Ashlyns secondary school which are already oversubscribed. This is farmland which and should not be developed on to protect this historic market down. Families exercise along these paths and fields for their mental health and physical wellbeing. The increased pollution from increase in traffic that this development will bring next to a primary school Thomas Coram school will adversely affect children's health - for example asthma and other respiratory conditions. As a local resident I urge Dacorum to turn down this proposal in order to protect the environment, as well as the pupils of Thomas Coram School and the residents of Berkhamsted town.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7108
<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>The Housing Delivery Strategy comment</b>	We must avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is flawed in many ways - in particular, it is driven by an unjustified housing target and fails to take into account post-pandemic working practices. We must not destroy so precious a natural resource on a whim or based on unsubstantiated targets.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7125
<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>The Housing Delivery Strategy comment</b>	The ONS projects a significantly lower housing need in this area than is intended in the Local Plan, the latter which is driven by the Government's National Policy. Berkhamsted is located in a valley bordered by the A41 on one side and AONB on the other. The infrastructure within this boundary is already bursting at the seams and the towns street network is already suffering from significant congestion and well documented parking issues. The topography and layout of the town simply doesn't allow infrastructure to be easily added, roads to be widened or cycle routes to be built within the town.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7136
<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>The Housing Delivery Strategy comment</b>	The plans are all based on pre-COVID assumptions and ways of working. Do we really need this many new homes? Do we really need to build them on green belt land? There seems to be a slavish devotion to a plan that's out of date, which was designed with faulty assumptions in the first place, and could adversely damage the local area for generations.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7156
<b>Person ID</b>	1265147
<b>Full Name</b>	Julian 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>The Housing Delivery Strategy comment</b>	While it is encouraging to see the reference to the climate emergency in the introduction, there is insufficient commitment to ensuring that any new housing complies with the highest standards of environmental efficiency. All new housing must be built with substantial insulation and all-electric heating systems, like heat pumps. The government has committed to net zero carbon emissions by 2050, and this will not happen if new housing is build with carbon emitting gas central heating. Any subsequent adaptation to newer technology is unlikely to happen if reliant on individual home owners having to make expensive adaptations or replacement of outdated systems.  Dacorum Council must insist on all new housing being built to the highest environmental standards.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7181
<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>The Housing Delivery Strategy comment</b>	I understand the need for more affordable housing throughout the country, but I'd be amazed to think that much, if any, of the proposed housing in Tring would truly be affordable level starter homes! Tring does not have the employment opportunities within the area.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7223
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing

target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.

**Included files**

**Title** The Housing Strategy

**ID** EGS7264

**Person ID** 1265027

**Full Name** Saba Poursaeedi

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** Strategic greenfield Growth Areas of 5,945 is morally unacceptable. It's detstroring nature, crippling infrastrcutre and for what? This will cripple the town

**Included files**

**Title** The Housing Strategy

**ID** EGS7279

**Person ID** 1264957

**Full Name** Mike Connell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	I do not believe an adequate infra-structure can be delivered to make these plans successful.  particular concerns are water supply, waste water and sewage disposal and provision of modern telecomms - fibre to the premises for all new build
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7308
<b>Person ID</b>	1265181
<b>Full Name</b>	ANDREW WOODFORD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I want to object to the proposed new homes in our local area (Dacorum) for the following reasons: <ul style="list-style-type: none"> <li>• The property numbers really concerns me the most. The 16,899 homes is a disproportionate increase considering the Governments projected population growth statistics. This is an unreasonable and unnecessary burden to undertake for our locality.</li> <li>• The impact of the proposed housing in our neighbouring towns of Tring and Berkhamsted, in addition to the 400 houses in Northchurch, will cause traffic congestion especially on our High Street. That's not discounting the obvious increased pollution and hazard this poses our children especially with our school placed right bang centre of the village with poor side-walks and access.</li> <li>• Northchurch is a village and is therefore very connected to its beautiful local countryside. Building on Green belt here and in Dacorum is unlawful as it has not been proven to be necessary. Within minutes of my home I can walk into lovely countryside and enjoy the peace and fresh air it provides, as well as the nature that inhabits it. You can not undervalue its importance for our physical and mental well being which to be honest has been highlighted in this Pandemic</li> <li>• I really worries me that we would lose our community and village identity as we meld into Berkhamsted. We are proud and see ourselves apart from Berkhamsted and wish to keep it this way. I've read mention of our village as</li> </ul>

'West Berkhamsted' and this upsets me as we have lovely tree lined roads a plenty, drives for our cars to park on and our own real sense of identity quite different to Berkhamsted.  
Please see the bigger picture and realise how unreasonable your current proposal is.

**Included files**

**Title** The Housing Strategy

**ID** EGS7320

**Person ID** 1265211

**Full Name** Mr N Monro

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** I strongly object to the vast number of extra dwellings planned for the Dacorum area. The expansion for each town would simply overwhelm already stretched resources - schools, traffic, healthcare etc.

**Included files**

**Title** The Housing Strategy

**ID** EGS7350

**Person ID** 1265336

**Full Name** SARA SADIQ-ALI

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am writing to object to the development on green belt land in Northchurch. You will decrease the quality of life significantly for all current residents and visitors. We live in a beautiful area with green belt land that has been deemed green belt for a reason. Green belt land should only be built upon if 100% necessary and we have not reached that point -there are other places in the country to build and the real statistics do not back this decision. If we build here we run the risk of climate change impacts, damage to environment and wildlife, as well as the wellbeing of our community. We choose to live in a place with open space to walk, have wildlife/pets and gain exercise in fresh air. We pay/have paid/continue to pay a premium to live here, but the development would reduce that quality of life without giving us back that premium.

The huge number of houses proposed - 16899 simply is not justified by the latest statistics on population growth. We are already experiencing issues of over capacity across Northchurch, Berkhamsted & Tring where we have gridlock traffic, lack of parking, very busy high streets, pressure on schools, doctors surgeries etc. If we add these houses, and specifically 400 in Northchurch we will have a great impact on these factors again decreasing quality of life which is what we all pay to live here for. There has been great community spirit in COVID times here where neighbours support each other and the community and the over-filling of our local area will diminish this as we will not be able to accomodate the numbers with the infrastructure and space that we have and building that infrastructure only adds even more invasion on the little free space that would be left after the housing was up. You can already see that doctors across towns are linking to be able to serve the community due to increasing capacity, pressure on supermarkets is high, schools districts are tight and options limited due to demand. We have reached capacity in order to maintain physical and mental wellbeing of the community, and to grow housing more here will directly lead to decline in both of these.

Northchurch is a beautiful, valued community and this development will cause irreversible damage.

I therefore wholeheartedly object to the building of these 16899 houses overall, and even more specifically as a resident in Northchurch the 400 here.

**Included files**

**Title** The Housing Strategy

**ID** EGS7352

**Person ID** 1265340

**Full Name** STEWART MILLER

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Overall, I'm concerned about the scale of population growth , and loss and destruction of green belt . The proposed 17000 new homes, and likely minimum of 2 people per household will add 30000 people to today's 150000 population of Dacorum. This seems excessive, beyond the scale required in the UK as a whole, and will place massive pressure on local infrastructure and roads.</p> <p>Additionally, the plan will destroy and permanently lead to the loss of 850 hectares of Green belt land in Dacorum, affecting both the character of the area and leading to adverse climate change effects with more pollution and less trees .</p> <p>In total this Plan is excessive in the Chilterns AONB. Indeed, it seems to almost ignore the AONB.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7359
<b>Person ID</b>	1265357
<b>Full Name</b>	Jan Dent
<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>The Housing Delivery Strategy comment</b>	<p>I am writing as a resident of Berkhamsted to register my objection to the DBC Local Plan on the following grounds:</p> <p><b>Housing numbers</b></p>

- 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. In view of the ongoing coronavirus pandemic, the number of planned homes needs to be urgently re-assessed.

### **Infrastructure & sustainability**

- The transport study takes *no* account of Berkhamsted's geography and valley. Most building is proposed along the top of the valley. The residents of these houses will need to access the town and, owing to the steep hills involved, will by-and-large use their cars, exacerbating existing traffic congestion and parking problems
- There are no significant proposals for improvements to roads or traffic flow. All additional traffic created will feed on to Shooters Way, Kings Road to town/station, and various rat-runs to avoid inevitable congestion and pollution.
- There are no significant improvements proposed for Berkhamsted's traffic situation, which is already excessive.
- Residents from the new housing needing to access the north side of the town and beyond will increase the flow over roads that are already blighted by volumes, speeding and pollution. Gravel Path and New Road suffer from choke points over the canal or under the railway or both, creating knock-on congestion back into the town.
- No proposals have been made to improve walking/cycling/public transport routes. These are essential given the steep hills between the majority of the new housing and the town
- No significant improvements to public open spaces (apart from garden-sized suggestions only.)
- The 'wildlife corridors' are simply a narrow strip along the A41, and don't connect with any meaningful habitats (no proposed tunnels for wildlife to go under A41 to access further green/habitat areas.)
- No additional health services – new surgery at Gossoms End is supposed to be able to cope with ALL the new developments. A minor extension of Manor Street is proposed.
- The nearest hospitals are already operating beyond their capacities, and there is no provision for increasing their capacity to cope with the increased numbers of residents planned. Also, an ageing population is going to need more accessible healthcare resources.
- The Plan claims that 2 primary schools and a secondary school will be built in Berkhamsted. It does not set out who will do this and how it will be funded.

### **Water**

- DBC is relying on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. It's not clear what impact the development proposals will have on this, as well as sewage – especially with a greater number of housing suggested. Again, any planning actions based on this flawed plan will be highly vulnerable to judicial review.

### **Employment Strategy**

- The Plan needs to be recast in the light of the major shifts in working and living habits accelerated by the Covid crisis. Working from home will significantly reduce the need for office space. In the Employment Strategy 8.10 additional office space of 188,000 square meters will need to be revised down, avoiding the need to encroach on Green Belt (8.18)
- The town of Berkhamsted is already overwhelmed by traffic and under-provided with parking. Several businesses have already left the town for these reasons.

### Greenbelt

- Nearly all development proposed will be on Green Belt. – this is *against* Government policy.
- The land between Shooters Way 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. *A green buffer is needed.* If this land is built upon, the already poor air quality on the south side of the town (and in the valley) will be considerably degraded beyond legal limits. There is no up-to-date consideration for this issue in the Plan
- DBC should look at further Brownfield sites – as it is required to do.

### Pollution

- Last but not least...Air quality is borderline in many parts of town, verging on illegal at times. Northchurch has had additional monitoring for several years as air quality is so poor.
- Traffic already regularly breaks the 20 mph speed limit in Berkhamsted with impunity, creating pedestrian danger and damaging air quality for the many schools that lie on, or close to, the A4251 that runs through Berkhamsted and Northchurch
- Drivers on Gravel Path consistently exceed the 30 mph speed limit. This road is not safe for pedestrians and cyclists as a result.
- : **23.75 "a sustainable movement corridor linking Leighton Buzzard Road in the west to Redbourn Road to the east" :**

If the A4146 Leighton Buzzard Road is the main N/S link between Hemel and Leighton Buzzard, then I assume traffic will increase along this road particularly with the increase in the number of residents as a result of the proposed housing development in Hemel. In peak periods this road is already difficult to join from the side roads and safer traffic measures will need to be introduced.

With the likely increase of traffic using the A4146, I wish to register concern about the potential increase of traffic using Gravel Path in Berkhamsted as drivers seek to travel E/W through Potten End and Berkhamsted and to make their way to Berkhamsted train station. This route is unsuitable for a significant increase in the number and speed of cars and re-routing should be considered to encourage drivers to stick to alternative main routes.

For example, access to / from Berkhamsted, and in particular to the train station, from the east is better directed along New Road, rather than Gravel Path, since New Road is wider, not so winding and dangerous and not residential.

The Safer Gravel Path Action Group is already active in trying to reduce the speed of cars using Gravel Path and the number of accidents involving the railway bridge and vehicles at the crossroads with Station Road / Ravens Lane / Ellesmere Road are proof to the unsuitability of this road for anything other than local traffic.

- Berkhamsted lies along a valley, with most residential areas along the bottom and up the sides. Air pollution naturally collects in this area. The proposed – excessive – developments, will result in poorer air quality.
- 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.*

**Included files**

**Title** The Housing Strategy

**ID** EGS7366

**Person ID** 1265362

**Full Name** ROSEMARY NORTH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am responding by email as I your website is not allowing me to submit comments.

Whilst I realise that there is a great need in Dacorum for affordable housing, the projected sites for housing in both Berkhamsted and Tring are well away from the town centres, which will necessitate travel by car. There is already a lack of adequate parking spaces in both towns.

Why is there a proposal to put a new supermarket on the Dunsley Farm site when there is a large Tesco opposite? Another supermarket should be located to the east of Tring where new housing is proposed. However, putting housing in that area will significantly detract from the currant rural views in an area of AONB. Brownfield sites should be used instead of cutting into the Green Belt, which should only be touched in exceptional circumstances.

The plan does not clearly explain in what ways Dacorum Council will mitigate Green Belt loss and meet the County's goals for climate change and carbon reduction. Where will car charging points be located? Currently there are only a few located in car parks in Berkhamsted.

Only one new school is proposed for Berkhamsted, on the west side of the town. However, on the south side there are major housing development proposals and Swing gate School and Thomas Coram School are both currently full.

**Included files**

**Title** The Housing Strategy

**ID** EGS7380

**Person ID** 1265369

**Full Name** ROB DOUGHTY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment** I would like to state that I disagree with the number of houses planned in the local plan to 2038.

**Included files**

**Title** The Housing Strategy

**ID** EGS7381

**Person ID** 485786

**Full Name** Mrs Jenny Bevan

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	I would like to object to the plan for excessive housing planned for green belt land in Dacorum. Green belt land should only be used in exceptional circumstances & I do not believe these exist.  I accept some housing is required but I do not think enough effort has occurred to find suitable brownfield sites. There are many empty retail & office units that could be turned into affordable flats.  I urge you not to just look at profit from selling land to greedy developers
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7388
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS7390
<b>Person ID</b>	494038
<b>Full Name</b>	Mr Stephen Lally
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I object to the present Dacorum Local Plan and the way it has been arrived at.</p> <ul style="list-style-type: none"> <li>• This high number of houses in Berkhamsted is not needed. New residents in them will have to commute to work and will find it difficult to shop in Berkhamsted town centre (access and parking) and so will commute to shop too.</li> <li>• There is not enough thought given to quality of housing environment (open spaces, trees).</li> <li>• Not enough thought has been given to the existing problems of infrastructure in Berkhamsted (Schools, doctors, drains, congestion and struggling up the hill to the new sites).</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7393
<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	Yes
<b>The Housing Delivery Strategy comment</b>	<p>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.</p> <p>I appreciate that things should continue in lockdown but for something as important and as significant as this should be done when people have the freedom to engage and discuss this issue which will adversely affect so many people. A proposal to increase housing in the borough by 25% on 2000 acres of Green Belt, countryside and urban green space is a major plan which needs to be fully considered by everyone involved . I hope that this is not being pushed through at a time when people cannot easily take a stand or get together to voice their opinions.</p>

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** The Housing Strategy

**ID** EGS7399

**Person ID** 1142987

**Full Name** Mr. Philip China

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

* No	
<b>The Housing Delivery Strategy comment</b>	<p>I am sending this email in response to the Local Plan Consultation and wish the following views to be considered:</p> <ul style="list-style-type: none"> <li>• I do not believe that such a high number of houses being considered can be deployed in this borough without significant environmental damage.</li> <li>• In relation to Kings Langley the loss of green belt land to accommodate housing development would severely impact the village when there are more suitable brownfield sites available. Infrastructure in the village (schools, doctors, etc.) would not be able to cope with any more significant development, especially after having such a huge upsurge in population with the Ovaltine deveopment in recent times.</li> <li>• If green belt is used for housing development it is not doing anything to address the climate emergency.</li> <li>• Green belt land protects villages like Kings Langley from merging into the neighbouring towns/villages. This then protects areas from becoming huge conurbations.</li> <li>• Post Covid I believe that everyone has learnt the value of our open spaces and need for recreation outdoors.</li> <li>• The effect of such large housing developments around the borough will impact on water supply, potentially damage local rivers and the wildlilfe they support, further affecting the impact on climate change.</li> <li>• What about the impact of further building causing water run off and associated flooding already being experienced in Kings Langley?</li> <li>• Car parking and traffic is already a huge issue in many places and particularly (in my experience) in Kings Langley.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7405
<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>The Housing Delivery Strategy comment</b>	The proposed Policy DM5, in providing the principle of conversion of houses to flats and

non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.

It is not clear as to whether the " windfall " calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. The calculation of housing provision should take into account the figure that can come from DM5. This would undoubtedly reduce the 'total' housing need figure

**Included files**

**Title** The Housing Strategy

**ID** EGS7415

**Person ID** 1265379

**Full Name** P Reynard

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I cannot understand your policy of building a such a huge amount of housing in Tring. This seems against government policy of building in cities and not small rural towns.

The use of so much green belt land will ruin Tring as well as destroying land which should be used for growing food crops, which in our present circumstances as a country will be much needed.

The infrastructure in Tring is already overstretched and would not cope with the influx of hundreds more people. The type of houses which would be built are too expensive for many people--not the sort that young people can afford.

We are going to end up with a conurbation stretching from Aylesbury through to Hemel Hempstead!! This is all wrong.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7419
<b>Person ID</b>	1265380
<b>Full Name</b>	JON 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>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “ windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7431
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “ windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7443
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy 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 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> <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.</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.

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** The Housing Strategy

**ID** EGS7483

**Person ID** 226124

**Full Name** Mr Nicholas Heath

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

* No	
<b>The Housing Delivery Strategy comment</b>	Secondly, if my understanding is correct, the estimated growth figures, particularly those around the supposed required number of new dwellings in the Borough, seem based, firstly, on central government figures for housing demand that are now out of date, and secondly upon an algorithm that I understand has been proven as flawed. It is reasonable to suggest that these deficiencies have probably been further exacerbated by the pandemic, and the central government responses to it, along with the profound shifts in societal behaviour around working, commuting, shopping, leisure and entertainment patterns. It is not possible at this point to speculate as to the extent that such behaviour will revert to pre-pandemic patterns over the coming months and years, but equally it would be to the detriment of the Borough's future to disregard their potential future effect. My understanding is that the current Local Plan was designed to endure into the early 2030's. For all of these reasons my conclusion is that the whole process appears to be a response to central government requirements based upon flawed and outdated modelling, that have also now been made further redundant by the changing behavioural patterns arising in response to the pandemic and the associated economic and social restrictions.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7491
<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>The Housing Delivery Strategy comment</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.</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>

This proposal needs revisiting in order to get the support of the local community.

**Included files**

**Title** The Housing Strategy

**ID** EGS7499

**Person ID** 1265562

**Full Name** ALICE WILNE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am writing to object to the proposed local plan.

I find it shocking and disturbing that the Council is looking to change so dramatically the size and therefore nature of our local towns.

Having grown up in the area and gone to school in Tring, I now live in Berkhamsted with my family. I value the character of these market towns and the amazing natural beauty of the surrounding countryside.

I find it very difficult to reconcile how there can possibly be a demand for the level of housing proposed. The statistics on which these numbers are based appear to be already many years out of date and on any basis clearly do not take account of the changes which the pandemic will undoubtedly have on housing needs. The local towns are currently very much in the commuter-belt for London with the inevitable knock-on effect on house prices. With more people working more often from home in future, it is widely considered that people will also look to locate much further out from London. It seems premature to put in place a Local Plan for such a drastic increase in house building before the true impact of the pandemic on working lifestyles and housing needs is known. Given the pace of change in businesses already in the last year, a delay of only a few years may be all that is necessary to get a better handle on what the local area's housing need actually is going to be over the next 10-20 years.

I am also particularly concerned about the impact on the local environment. I am shocked to learn that it is even possible to build on green belt land and dismayed at how much of it is proposed to be sacrificed for “growth”. The impact that such an increase in the local population will have on the surrounding countryside will surely be immense and in particular will increase the need for water extraction from the aquifer which will threaten the upper reaches of the rivers Gade and Bulbourne, and is likely to leave these dried out to nothing.

Finally I consider the way this consultation has been conducted is simply inadequate. We received for the first time today - 25 February - a leaflet through the post with some details of the Local Plan from the Council. This is for a consultation which apparently opened on 27 November 2020 and is to close in two days’ time. Fortunately I had recently been alerted by a friend to do my own reading on the plan but I am concerned that many in the local community may not have been aware of the plans until this late stage or even now.

I am also submitting this objection by email as the online portal for doing so is so unwieldy. How anyone who is not online or computer literate is supposed to respond to the consultation I don’t know. Limiting the ability to respond to this format must surely be excluding a sizeable proportion of the local population.

I hope that the Council will reflect and accept that this plan needs to be delayed until there is greater clarity on the likely impact of the pandemic. In the meantime the opportunity could be taken to consider further the environmental impact and in particular the purpose and precious nature of the green belt. Once it has been built on, we won’t get it back.

**Included files**

**Title** The Housing Strategy

**ID** EGS7502

**Person ID** 1265565

**Full Name** COLIN DICKENS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	I fully support the councils stance to request that the proposal to add additional housing in Dacorum should be scaled back from the numbers planned. There are many reason for my objections to the large increase in the numbers proposed including but not limited to the effects on the local services, the increase in traffic in an already congested area. The increased pollution which will come from thousands of additional households and their movements. Much of the development will be on green belt land and will result in areas once separated with green open spaces becoming one sprawling mass.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7507
<b>Person ID</b>	1265569
<b>Full Name</b>	KATE CARTER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>We need you to think again about the Dacorum Local Plan. Please read the following:</p> <p>Green Belt policy aims to prevent the urban sprawl which is reducing quality of life in so many cities across the world. This unsustainable form of development swallows up farmland and wildlife habitats while increasing air pollution, flood risk and car dependency.</p> <p>Although Hemel Hempstead is a large town, it is not large enough to generate the income, status and independence required to keep it sustainable. Larger towns such as Slough, Peterborough or Milton Keynes have a more robust financial outlook. Hemel Hempstead needs to grow in order to survive in the future.</p> <ul style="list-style-type: none"> <li>• Dacorum’s Local Housing Plan is flawed, it is Hemel Hempstead that must make the most of the Local Plan.</li> <li>• When the Government changed its policy, you should have changed your Strategy.</li> <li>• You decided to rehash work you’d already done.</li> <li>• There is no need for the thoughtless grab at Green Belt Land.</li> <li>• You are planning for too many of the wrong houses in the wrong places.</li> <li>• Your plan wastes acres of productive farmland and beautiful countryside and damages the setting of the Chilterns Area of Outstanding Natural Beauty.</li> </ul>

Your plan is for too many houses where there are too few local jobs, making commuting worse. Finally , it will overwhelm Tring and Berkhamsted, put strain on our already stressed communities and overload local facilities.

Please think again, you know it is the right thing to do.

**Included files**

**Title** The Housing Strategy

**ID** EGS7510

**Person ID** 1265572

**Full Name** DAN STOBBS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy 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, especially here in Hemel Hempstead. We currently have a hospital that lacks many key departments such as an A&E or a 24 hour urgent care centre and is constantly seeing departments and services removed and relocated to Watford, not enough GP surgeries for the existing number of residents across Dacorum, we no longer have a walk in police station or adequate police staffing numbers, or sufficient schools or residents' parking. Building more housing is going to make all of these areas much worse, particularly when the proposed infrastructure is severely lacking.

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** The Housing Strategy

**ID** EGS7515

**Person ID** 1265573

**Full Name** DAVID WARREN

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>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.</p> <p>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.</p> <p>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.,</p> <p>I look forward to your comments and a redraft of the Local Plan.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7534
<b>Person ID</b>	1146073
<b>Full Name</b>	Mrs Emma Kingham
<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>The Housing Delivery Strategy comment</b></p>	<p>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.</p> <p>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.</p> <p>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</p> <p>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</p> <p>Your plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses</p> <p>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&amp; Rural Communities Act 2006.</p> <p>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.</p>
<p><b>Included files</b></p>	
<p><b>Title</b></p>	<p>The Housing Strategy</p>
<p><b>ID</b></p>	<p>EGS7538</p>
<p><b>Person ID</b></p>	<p>1265590</p>
<p><b>Full Name</b></p>	<p>Ms Hazel Ellis</p>
<p><b>Organisation Details</b></p>	
<p><b>Agent ID</b></p>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I have just been looking at your proposals, and frankly it makes me want to move from the town I have lived in all my life. How can we possibly need this many houses? How is it acceptable to build on Green Belt land EVER? The land above Piccotts End is one of the few areas left as a "green lung" just outside the town.</p> <p>Why do we need the town centre to be crammed full of houses and flats with little or no parking provision? I note you are even proposing building on an existing car park! We have seen the results of over-development in the Nash Mills and Apsley areas with regards to parking issues. This will make the entire town unnavigable for motorists.</p> <p>The proposals all around the Box Moor Trust land and Two Waters area are intrusive and excessive. Again, this is one of the few places in the town centre that is natural and green.</p> <p>And finally, how can it possibly be acceptable to build this many new houses when there is NO HOSPITAL for our town? I am completely exasperated.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7540
<b>Person ID</b>	1265592
<b>Full Name</b>	Pat & Bernadette Hansberry
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>During our 10 years living in Berkhamsted, my wife and I have taken great interest in the development of the town and particularly how it has grown to meet the housing needs within the borough. Therefore, we would like to record our views regarding the proposals contained within the "Emerging Strategy for Growth (2020-2038)" which we understand is designed to set out DBC's approach to accommodating further growth across the borough, outlining which sites are</p>

proposed for development and the policies that will cover the delivery of these developments and other developments within Dacorum.

**We would like to register the strongest objection to the choice of several of the development sites that are contained within the Plan given that I live in Berkhamsted, the prime objection is to the proposed developments within the Berkhamsted area.**

Our objections are made upon three fundamental strategic grounds that I/we have set out below:

- 1 **Incorrect Assumptions for Housing Provision.** Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, we have serious concerns regarding the sheer scale of proposed development in Dacorum. The Council appears to have 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. Indeed, recent Government guidance on calculating housing need has been, at best, confusing. 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.** We would remind the Council that on Wednesday 16 December the government published its response to the local housing need proposals on the consultation on changes to the current planning system. This sets out important changes to the standard method which has been amended so that the 20 most populated cities and urban centres in England (none of which are in Dacorum) see their need uplifted by 35%. The Government also said:
  - ***"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."***
- 1 **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". However, 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 prime reasons that my wife and I have chosen to live in this area. We 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".**

- 1 **Failure to Provide Adequate Supportive Infrastructure.** Specifically, my wife and I have looked at the proposed developments on Green Belt land around Berkhamsted and state categorically that there is insufficient consideration in the Plan for the provision of new or of upgrading the current infrastructure to support the scale of the proposed developments. Berkhamsted is already a Town which is at capacity in terms of schooling, road services, water supply and wastewater disposal.

We trust our objection will be taken fully into account and am sure that you will see many more similar objections from other residents of Berkhamsted that the proposed developments within the town are wrongly premised, should not take place on Green Belt land and do not make proper provision for improved infrastructure for the town to accommodate such large developments.

**Included files**

**Title** The Housing Strategy

**ID** EGS7542

**Person ID** 1145685

**Full Name** Mrs Moira Graham

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

We currently have a 12,000 population in Tring and the friendly market town is already full. We have building at the end of our road and together with the proposed sites across the area, there appears to be a total of nearly 2,300 houses being built, infill housing does not appear to be included in these proposals. The national average of house occupancy is 2.4 but I think the types of houses proposed will be higher than this. Working on 2.4 there will be an increase of about

5,500 people, which is almost a 50% increase in the current population. I'm sure there will not be a 50% increase in schools, policing, doctors, hospitals, train station (commuting trains and car parking have been full for years) and all the other trades and services in Tring. The proposals are way out of proportion to this lovely town and so much green belt has already been used or earmarked for development.

We object most strongly to this proposal.

**Included files**

**Title** The Housing Strategy

**ID** EGS7548

**Person ID** 1261622

**Full Name** Marc Gloder

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

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.

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.

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.

Thank you for your time.

**Included files**

**Title** The Housing Strategy

**ID** EGS7555

**Person ID** 1153904

**Full Name** Ted Carroll

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I strongly object to the Housing Strategy with in the Dacorum Local Plan.

The plan:

- Fails to protect the Greenbelt, as commented on by many organisation – given the climate emergency agreed by DBC, it seems counter productive to then destroy large areas of green belt.
- For Berkhamsted and Tring, it will result in primarily expensive properties a long way from the town centre, which will generate significant additional traffic into the town centres.
- Although the total numbers proposed are likely to change when the government redoes its algorithm for housing numbers, I do not specifically object to the number of housing units. I believe the conclusions that should have been drawn from the evidence is:
  - A greater proportion of proper affordable housing to rent and / or buy to lead to a vibrant community and provide labour for local businesses;
  - Denser housing close to town centres of Berkhamsted and Tring on brownfield sites, enabling people to visit the town centre by walking, not car;
- It is notable that DBC has not engaged the communities with what type of housing they want or need, and where it needs to be but has taken input from house builders where they would like to build and where they can maximise profit on large greenfield developments. This plan has been universally condemned by a large proportion of the community that DBC is meant to serve.
- A proper consultation exercise is required for local people and I believe a very different plan would emerge.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7556
<b>Person ID</b>	1163966
<b>Full Name</b>	Philippa 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>The Housing Delivery Strategy comment</b>	<p>I am a resident of Berkhamsted and am appalled by the plans to develop the countryside here which is within the Green Belt. It has always been a policy to maintain rural areas for the use of farmers, walkers and young people who need to understand the importance of natural land. Most of the land around Berkhamsted is within the Green Belt and should not under any circumstances be given over to development.</p> <p>Without the Green Belt there would be catastrophic death of wild animals and farmers' crops. It is unconscionable to urbanise the beautiful Hertfordshire countryside, and its refuge for wild animals. There should be no house-building in these areas given the need to maintain the Green Belt and natural woodlands.</p> <p>A key function of the Green Belt is to absorb the rain fall so that flooding is more controllable. With the hard surfaces that building will bring, there could easily be widespread flooding as a consequence.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7558
<b>Person ID</b>	1263717
<b>Full Name</b>	Helen Wells
<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>The Housing Delivery Strategy comment</b>	<p>Whilst appreciating the need for extra housing in the borough, I question the sheer number of dwellings that are planned. In view of the changes to employment caused by the Covid crisis, most forecasts predict that working from home will increase significantly, once the present outbreak is under control. In many respects, the Covid epidemic has only speeded up an existing trend. Additionally, the present Government has announced its intention to reinvigorate areas in the Midlands and North to increase industrial and business investment and employment opportunities in these areas. I suggest that , taking into account the Government's policy of moving business out of the Home Counties and the fact that, in this age of electronic communications, distance to work ceases to be a governing factor, large numbers of people will wish to live in a much more reasonably priced area than Dacorum.</p> <p>In light of these considerations, a reassessment of the Dacorum Local Plan is urgently required.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7562
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS7570
<b>Person ID</b>	1265607
<b>Full Name</b>	Victoria Hayes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>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.</p> <p>In my view there are three main reasons why this is not a suitable site for a development of this size.</p> <p>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.</p> <p>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.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS7578
<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>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “ windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7589
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS7617
<b>Person ID</b>	1265742
<b>Full Name</b>	Clare 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>The Housing Delivery Strategy comment</b>	<p>I am against the expanding and extension of building on green belt land around Hemel, Kings Langley, and Berkhamsted. It is ludicrous that you would think it is advisable to look to build on more of our green spaces. The infrastructure is not good enough to support more housing. The hospitals are struggling, schools, roads. Also a lot of the land has drainage problems, we have seen leads to flooding.</p> <p>Wildlife will be impacted severely too. This area is beautiful, please stop spoiling it.</p> <p>Please don't build on green belt land.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7630
<b>Person ID</b>	1265747

<b>Full Name</b>	STEPHANIE BRADLEY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I would like to make the following points:</p> <p>To hold such a detailed plan consultation in the midst of a worldwide pandemic is questionable. People are far more focused on other issues crucial to their survival and have been over the past year. This is borne out by the tiny number of responses you have received.</p> <p>The plan was presented in a way that was not user friendly, salient points were not easily picked out, even by those who are highly educated, let alone those are not. This type of plan should be presented in a clear and concise but fully explicit manner such as an exhibition, with displays that are accessible to all (clearly not possible in a pandemic), for all areas of Dacorum.</p> <p>The response portal is not at all user friendly and has put many people off responding.</p> <p>The plan and consultation was not widely advertised and only after much petitioning about this point was literature sent to every household. The literature sent was wholly inadequate and set to mislead about some of the most important (and controversial) posts in the plan.</p> <p>The pandemic has resulted in massive changes in lifestyle and these are not reflected in the plan, therefore it should be revised in light of these major changes to how we live and work.</p> <p>It makes no sense to use the 2014 ONS figures with the incorrect algorithm when more realistic projected numbers can be based on the more recent 2018 projections. Using the 2014 figures does not provide an “objectively assessed need”. Consequently the numbers projected are far too high.</p>

Villages will cease to be self-sustaining and become car-linked hubs to the main towns.

Social housing needs for the area will not be met by this plan.

The projected use of greenbelt land should not be pursued and the greenbelt should be protected. Alternative locations must be sourced as a priority and the greenbelt protected.

There is no mention of the Glover report which proposes that the AoNB becomes a National Park. This plan goes against this report.

Climate Change considerations are key. The plan does not address how house building and subsequent use, transport and infrastructure will align with the Government 2025 net zero target. The carbon cost of using greenbelt land is key.

Many of the documents referenced are in draft form and not up to date., including the habitats assessment (2006). There are no Habitats Regulations Assessment Documents .

Biodiversity value change assessments should be included and verified independently.

Most of the developments will be taken by commuters rather than locals as not affordable for locals. Priority and affordability for locals should be key.

Inadequate transport and infrastructure: Provision must be made for sustainable transport from existing and new developments. Most of the new developments are out of town and the car cannot be prioritised for travel to stations (most of these developments will be for commuters and few locals). Bicycle travel must be prioritised. I am too scared to cycle on the roads. My husband has had 3 serious accidents (broken collarbones twice) due to potholes.

The people of Dacorum must have this plan explained to them so that they can understand the full impact of the plan proposals and hopefully realise that it is highly detrimental to future generations and can challenge it accordingly. Having spoken to them, almost all of my friends have no real idea about any of it and the seriousness of it.

The points above should be addressed and the plan put out for consultation in a correct manner once the world returns to some sense of normal... our future depends on it.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7662
<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>The Housing Delivery Strategy comment</b>	<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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS7667
<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>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7668
<b>Person ID</b>	1265755
<b>Full Name</b>	LUCY BENNETT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I am writing to express my concern at the local housing plan of building 16000 new homes in the area. This is not what the residents want. The housing data that is being used is from 2014, completely unnecessary when there is data from 2018 which shows we actually only need half the amount of housing.

These proposed plans also do not take into account the opportunities to redevelop existing retail and commercial sites. If these haven't been considered, then building on green belt land should not be accepted as our green belt is far more important.

Our green belt land must be protected. The green belt land such as Rectory Farm helps protect the shape, size and character of towns and villages like Kings Langley. It also prevents villages from merging into one another. After seeing the disastrous flooding in Apsley Lock and the current new builds in Kings Langley right on the canal, more housing estates this large should not inappropriately be built.

Last of all, Dacorum does not have enough water to supply this extra housing. It has been admitted that the water needed has to be extracted from the chalk aquifer which in turn will damage the boroughs chalk rivers which are classified as priority habitats.

Thank you and I hope Dacorum takes these responses into consideration.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS7705

**Person ID**

1265762

**Full Name**

Margaret Puckey

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**The Housing Delivery Strategy 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**

The Housing Strategy

**ID**

EGS7722

**Person ID**

1265770

**Full Name**

Michelle and Christopher White

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

My husband and I write to add our voices to the call to Government to lower the housing numbers that have been imposed on us thus far/are being proposed.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS7749

**Person ID**

1265780

**Full Name**

James McDonald

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</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>	The Housing Strategy
<b>ID</b>	EGS7755
<b>Person ID</b>	1146062

<b>Full Name</b>	Mr Jon Salmon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Please take this email as my formal response to the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Consultation.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the consultation. To avoid repeating the extensive points made in their response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>There are many reasons why I object to the Dacorum Local Plan, including its destruction of our vitally important Green Belt and the lack of infrastructure to support it. In addition, I think the number of proposed developments across Dacorum is excessive and I question the formula used to calculate it.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7761
<b>Person ID</b>	1265793
<b>Full Name</b>	PHILIPPA 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>The Housing Delivery Strategy comment</b>	From the information being widely circulated to residents of the area, for example by Councillor Liz Uttley, it would appear that the amount of new housing being planned is based on an out of date forecast from 2014. The up to date data would

forecast a significantly lower requirement for housing, in the region of one third of what is being planned. There is no excuse for ignoring this.

Whilst it is necessary to build more houses when genuinely needed, in particular affordable housing, building more houses also causes a number of negative issues:

- This plan involves the irreversible destruction of green belt land.
- The current infrastructure is not sufficient to support the proposed new houses. As a Markyate resident, I am particularly concerned about spaces in the village school, parking and traffic congestion around the already strained village roads.
- 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.

Due to these negative impacts of building additional housing, **it is vital that the plan is based on the best and most up to date data**. The fact that the plan is currently to build far more houses than is needed, because it is based on out-dated information, is unacceptable. The negative impacts due to this unnecessary plan will be unforgivable.

I am also concerned that the new plans will not include enough genuinely affordable housing.

If this call from a large number of residents to re-assess the quality of the data used in the formation of the plan is ignored, it will look like corruption. I sincerely hope sense will prevail.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7790
<b>Person ID</b>	1265904
<b>Full Name</b>	Mrs Alex Brown
<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>The Housing Delivery Strategy comment</b>	<p>Why are these proposals still being put forward? The Government guidance has been mixed over the last 6 months - this alone should be enough to make you withdraw these plans and reassess them - and the overall requirement for growth of housing across the borough. The Council has based its figures of housing needs in these plans on the data from the Office of National Statistics (ONS) 2014 and NOT the most recent ONS statistics which were published in 2018. So how can your plan be considered sound, valid, correct or appropriate in any way shape or form when it is based on incorrect data?</p> <p>What further detracts from all credibility of your plan is your admission that there are “uncertainties over using this as our housing figure” and “further refinement to the process of calculating housing need” is required. I am dumbfounded by this - you voice your own uncertainties of the housing figures and admit further refinement of housing need is required - and yet you have the temerity to put these plans forward for approval and plan to act on them - WHEN YOU KNOW THEY ARE NOT CORRECT.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7796
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by a faulty vision, settlement hierarchy, unjustified housing targets and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. They also fail to take into account post-Covid 19 pandemic working practices.</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7807
<b>Person ID</b>	1265908
<b>Full Name</b>	Samuel Bramhall-Allan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I strongly disagree with the local plan proposed in Dacorum. The destruction of our green belt land to build more houses than required is preposterous. There are a multitude of brownfield sites that are more suitable. We do not have the demand, schools, doctors or infrastructure for it. Do not destroy a beautiful area for financial gain.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7809
<b>Person ID</b>	1265812
<b>Full Name</b>	Mrs Shelagh 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>The Housing Delivery Strategy comment</b>	I am writing to protest about the number of houses you are proposing to build in Northchurch and Berkhamsted. I think it is an outrage that you are even considering selling off large chunks of Green Belt for housing. I am strongly opposed

to housing being built along the canal side near the canal bridge in New Road, the bridge is already a bottleneck and would cause more queueing traffic to get onto the main road in Northchurch not to mention adding to the already congested road into Berkhamsted, together with the additional pollution.

I am also very much opposed to any further development between Darrs Lane and Durrants Road. Darrs Lane is already a busy road and 400 new homes would create increasing pollution as 400 new homes could mean 800 further cars, most family homes have 2 plus cars. Our local roads, especially Darrs Lane, are already in terrible condition, will the Council be able to keep up with repairs?

It is already difficult to get a doctors appointment in Northchurch/Berkhamsted, our schools are overflowing and our roads are congested. I think the Council should think again before going ahead with these and the other 2,000 home projected to be built in this area in the coming years. Our villages ought to be protected from this kind of irresponsible planning and the greed of large building companies. The vast majority of these houses will be beyond the reach of first time buyers and people on lower incomes who will be forced to move away to obtain housing.

**Included files**

**Title** The Housing Strategy

**ID** EGS7824

**Person ID** 1265913

**Full Name** Mark Cooper

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy 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. In fact the position is more significant when noting the significant plans of St Albans District Council to do the bulk of their growth as far away from the City as possible, locating large volumes of new homes directly adjacent to Hemel Hempstead which will put a further strain in the area on infrastructure than just the Dacorum proposals – with these homes being located miles from St Albans.

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. It also does not address the

We are located in an area designated as in severe water distress, with Affinity Water rolling out compulsory meters across the area in an attempt to get us all to use less water to do our bit to help protect already limited resources. Through the summer of 2020 direct pleas were made by Affinity Water to us, their customers, to drastically scale back on consumption to avoid restrictions and service interruptions. With the huge development planned by St Albans District Council and now this as well it appears at odds with this issue. 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. The current HS2 scheme is also tunnelling through the chalk seams what if they alter the way these aquifers naturally operate?

**Included files**

**Title** The Housing Strategy

**ID** EGS7828

**Person ID** 1265104

**Full Name** Darren Eldred

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** I would like to respond to the consultation, although I find the comment functions within the consultation portal quite difficult to use, so am responding by email.

I don't believe that the plan makes a good case for the high number of homes planned nor why such a high proportion of them are located in the Hemel Hempstead area.

Specifically, I understand that the population growth estimate is based on a 2014 ONS prediction and that this has been superseded by later figures from 2018 which suggest a lower population increase. Also, given uncertainty about future population change through immigration following Brexit, it seems reckless to commit to a plan of this scale without better and more current data supporting the forecasts.

**Included files**

**Title** The Housing Strategy

**ID** EGS7837

**Person ID** 1265916

**Full Name** Susan Edwards

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I object to the proposed local plan for Dacorum, which has been based on incorrect statistics. With regard to BK06, West Berkhamsted, although it is actually Northchurch, I realise that more houses need to be built in the area but too many houses, 200 of the wrong type are proposed and the only people that will benefit are the developers selling off the green belt. What we need in this area is good affordable social housing using brown-field sites, not using green belt land. There has been too much green belt land built on already in this area and the local roads cannot cope with the extra traffic.

I would like to draw your attention to The National Planning Policy Framework set out by the government in 2019, Chapter 13 Protecting Green Belt Land. It's states that:

**133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.**

**134. Green Belt serves five purposes:**

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

Why is the National Planning Policy Framework being ignored? Surely it was put in place to protect the green belt? How much work has been undertaken to identify brown field sites that could be used in the area instead of green belt land?

We should be protecting our green belt for future generations, not destroying it.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS7846

**Person ID**

1145752

**Full Name**

Mrs Lucy Cross

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

The draft plan will fail to deliver affordable housing and will result in the destruction of valuable green belt land which should be protected for the benefit of local residents. The plan is based on a housing target which has not taken into account the constraints of the local area and the council has not determined the appropriate level of housing need for the area. The plan does not meet the requirements of the NPPF to protect green belt land and is not sustainable and is likely to be detrimental to the environment. It does not address the climate emergency and many of the sites earmarked for the development will result in additional car journeys increasing carbon emissions, pollution and congestion.

The plan was drafted prior to the pandemic and before the latest clarifications to the national Government’s strategy on planning and therefore the plans for significant development of green belt land are completely unjustified and also appear to be unnecessary. The government has stated that green belt land should only be built on in ‘exceptional circumstances’ and the council have not demonstrated that such circumstances exist. The only justification given for building on green belt land appears to be that it would be required to meet the housing target that the council has set. On December 16th 2020, the Government published a response to the recent white paper consultations in which, with reference to protected landscapes and green belt it stated “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places”.

The National Planning Policy Framework provides protection for Green Belt land and the land due to be released around Berkhamsted should be protected in line with this framework. There is no justification for building on green belt land that is designated as such to protect the countryside and prevent urban sprawl. The government also stated in December 2020 that “Within the current planning system the standard method [for setting the housing target] 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 constraint areas face, such as green belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. 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.”

The council has taken the target calculated using the standard method but has not taken into consideration all of the above mentioned factors including the protection of the green belt to calculate an achievable housing target. In other words, the housing target on which the local plan is based should be reconsidered and as there are no ‘exceptional circumstances’ a new target should be determined which can be achieved without the development of green belt land.

Dacorum Borough Council has declared a climate emergency but this plan does not adequately address this issue and in fact is likely to make the problem worse as a number of the proposed sites, especially those around Berkhamsted are likely to encourage use of cars as walking and cycling to the town centre and railway station will not be viable options for the vast majority of people due to the distance and gradients of the hills. In addition to increasing carbon emissions this will add to the traffic in what is already an over congested town centre and increase levels of pollution in the town. The council should only consider development that will minimise the number of additional car journeys and actually take steps to address the climate emergency.

**Included files**

**Title**

The Housing Strategy

<b>ID</b>	EGS7866
<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>The Housing Delivery Strategy comment</b>	(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7896
<b>Person ID</b>	1265990
<b>Full Name</b>	JULIA BRAGG
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy comment</b>	<p>I have lived in Berkhamsted for over 19 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>1. 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. Since then, the ONS has reduced the number of dwellings it calculates will be needed by more than 50% ,down to 355. The government has used an algorithm to turn the ONS number of 355 nto 1,023 dwellings. Let's 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> <li>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.</li> <li>3. There is no clear detail on how public amenities such as water and sewage will cope with all this additional development.</li> <li>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.</li> <li>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.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7912
<b>Person ID</b>	1265992
<b>Full Name</b>	KATY PHILLIPS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I understand the need to increase housing, however this needs to be done in a way that will preserve the greenbelt. The plans to increase housing in Dacorum by 16,600 new homes is way over what the projected need is. The latest ONS

data available projects 6051 new homes by 2038 - 64% fewer than this plan projects. I am objecting to the proposed plans and would like this email put forward to the board making the decision.

Within Dacorum there is already a high demand for services such as traffic needs, schools and healthcare in particular a hospital. The plan does not commit to any level of sustainability in its sustainability targets.

**Included files**

**Title** The Housing Strategy

**ID** EGS7943

**Person ID** 1265997

**Full Name** ROSE SHERIDAN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

**Included files**

**Title** The Housing Strategy

**ID** EGS7945

**Person ID** 1265998

<b>Full Name</b>	BRYONY CLARK
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I would like to object to the proposals made in the Dacorum Emerging Strategy for Growth (2020-2038) documents for the following reasons:</p> <p>The plan for Dacorum development is based on outdated, overestimated numbers:</p> <ul style="list-style-type: none"> <li>• 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. The proposed numbers have been based on the outdated 2014 ONS figures providing significantly overestimated figures. It seems perverse not to proceed with outdated numbers when newer ones are available.</li> <li>• The proposed loss 850 hectares of Green Belt in the proposed plan, the wider countryside and urban green space to new development runs counter to the climate emergency declared by Dacorum Borough Council.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7949
<b>Person ID</b>	1265999
<b>Full Name</b>	CAROLYN AND SHAWN BAGGS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy comment</b>	<p>We are writing this to state that we strongly disagree with the proposed plan for the additional houses in Berkhamsted and Tring.</p> <p>We have lived here for 12 years and have always loved the village feel and countryside surroundings to our historic town. Although we accept the need for new properties to house a growing population, the magnitude and location of this plan is misconceived. Not only will this turn Berkhamsted into a suburban town putting great strain on our current schools, healthcare and pollution levels, a significant amount of our beautiful green belt will be lost.</p> <p>This natural surrounding area is full of wildlife habitat, much rare, and is an integral part of what make Berkhamsted and Tring healthy and sustainable villages, providing clean air and diverse wildlife - absolutely essential in this age of climate emergency. To destroy this existing habitat and replace with a poor, tiny replacement labelled as a nature reserve is both foolish and despicable.</p> <p>In addition, 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.</p> <p>This proposal needs revisiting in order to get the support of the local community - and moreover properly planned in a suitable location that would benefit from revival and human habitation - for example wasteland or regeneration of a decrepit town - not bulldozing green belt needlessly.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS7950
<b>Person ID</b>	1266000
<b>Full Name</b>	JANE OSTLER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy 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 &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>	The Housing Strategy
<b>ID</b>	EGS7981
<b>Person ID</b>	1266010
<b>Full Name</b>	MOLLY 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>The Housing Delivery Strategy comment</b>	<p>I am a local resident and business owner and I would like to oppose the current plans for Hemel Hempstead and the surrounding areas. In particular Bovingdon Village which looks set to be joined with Chesham and Hemel Hempstead. Leverstock Green which looks set to join St Albans and all around the M1 area. The amount of new homes target for our area is ridiculously excessive! The number is far too many in an already over crowded area. We do not have the roads, schools and doctors required to service such a huge explosion in our already over stretched population and the only way to build what's needed is to bulldoze our local green belt. It is insane that in 2021 with all we know and understand about climate change that local residents are having to fight our local government to stop them from further worsening our situation. We do have small localised issue of flooding already! The overall target needs to be brought down to a</p>

realistic number that reflects our town and it's needs. There are many brown field sites that need to be developed over this valuable green belt and this needs to be in proportion with the space being used. Tiny homes with little to no parking is not suitable and creating many issues and housing London movers rather than locals. This is not good enough and the target number of new homes needs to be half of what is currently proposed. As well as being on existing derelict sites of which there are plenty in Dacorum.

**Included files**

**Title** The Housing Strategy

**ID** EGS8010

**Person ID** 398885

**Full Name** Mr Barry Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy 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** The Housing Strategy

**ID** EGS8022

**Person ID** 1266029

**Full Name** JAN AND GORDON BULLOCK

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>Over-provision of housing</b></p> <p>Whilst accepting the the country needs more housing, this plan is based on figures that the government has now withdrawn because of the impact on Green Belt land in the South East. As a result most of the South East has now received lower housing targets, but for some reason the revised target for Dacorum (and the rest of Hertfordshire) has actually increased. The Government’s most recent target is based on estimates from the Office of National Statistics from 2014. I believe that the local 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, almost half the figure on which the plan is based. This lower number would significantly reduce the need to build on Green Belt. Whilst I understand that Dacorum is challenging the Government target, this major uncertainty undermines the validity of the draft plan.</p> <p><b>Impact on the Green Belt and The Chilterns Area of Outstanding Natural Beauty</b></p> <p>Although Dacorum states that a key objective is ‘minimising and managing the requirement for development on the Green Belt land and the impact on the Chilterns Area of Outstanding Natural Beauty’, the scale of the proposed housing development can only have a significant and detrimental impact on the natural environment.</p> <p><b>Underestimating brownfield site potential</b></p> <p>Although the Plan includes some brownfield site development, the major housing developments are on the outskirts of Hemel, Berkhamsted and Tring. The Plan fails to take into account the likely impact of the coronavirus pandemic and recent changes to planning which may free up more sites in town centres. Anything which reduces the impact on the Green Belt should be very carefully explored.</p> <p><b>Unsustainable Development</b></p> <p>Focussing building on the outskirts of the main towns means that the developments are some distance from the existing transport infrastructure. The Plan states that ‘the local and strategic road network has sufficient capacity providing there</p>

is a greater uptake in walking, cycling and passenger transport’, which is unlikely as the proposed developments are so far from the existing rail and road transport hubs.

The Plan goes on to say ‘we are continuing to develop the transport proposals’, but the development area allocated to the north of Hemel does not have any existing transport infrastructure, and the Plan does not set out what would be put in place. Without a credible plan for sustainable transport it is likely that the development will result in several thousand more cars on local roads.

**Included files**

**Title** The Housing Strategy

**ID** EGS8028

**Person ID** 1266031

**Full Name** EAMONN BRENNAN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**The Housing Delivery Strategy comment**

**Headline numbers preposterous and unsustainable**

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”.

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?

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?

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8032
<b>Person ID</b>	1266031
<b>Full Name</b>	EAMONN BRENNAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<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>	The Housing Strategy
<b>ID</b>	EGS8033
<b>Person ID</b>	1266034
<b>Full Name</b>	GRANT TUNMER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>The Housing Delivery Strategy comment</b>	<p><b><u>n 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:</u></b></p> <p>I object to the proposals in the consultation because the proposals to build on the green belt are wrong.</p> <p>It is my understanding that there needs to be proof that building on the Green Belt is absolutely necessary before any Green Belt land can be released. I do not believe that this has not been shown. On top of this there has not been enough scrutiny of brown field sites</p> <p>The housing projections are based on out-of-date statistics without taking into account the expected impact of Brexit and the COVID-19 situation on projected housing demand. Also COVID-19 has changed behaviour meaning more town centre development is possible which has not been taken into account.</p> <p>It appears that the needs of the developers have been prioritised over the needs of the local people. There are too many houses proposed, but 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. This developer led housing will not provide more social housing for those on the waiting list, it will just benefit developers. We should be building the right houses in the right places for local people, not giving a green light to urban sprawl</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8065
<b>Person ID</b>	1266047
<b>Full Name</b>	Andrew Willcox
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>The Housing Delivery Strategy 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.</li> <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>— COVID-19 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.</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> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8080
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development

at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.

**Included files**

**Title** The Housing Strategy

**ID** EGS8097

**Person ID** 1266056

**Full Name** Christine Locke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

I oppose the development plan, particularly with regard to Tring and Berkhamsted.

The number of proposed new houses is out of proportion to the existing towns and, I believe, based on an algorithm pre-dating Covid. The extension of the towns and intervening villages risks them becoming unrecognisable.

The claim to provide 'affordable' housing is unlikely to be realisable, given the wages available locally and the high cost of land.

Ecologically sound housing is needed and should not be built on green belt land.

I have many other objections but no confidence that the council will listen.

**Included files**

**Title** The Housing Strategy

**ID** EGS8110

**Person ID** 1266066

**Full Name** Shelley Greenaway

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS8114
<b>Person ID</b>	1266068
<b>Full Name</b>	Jo Sands
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	Please do not build all these new houses in Dacorum on green belt land.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8158

<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS8182
<b>Person ID</b>	1266123
<b>Full Name</b>	Elizabeth Morris
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	Use of old data. It is laughable that the ONS data used is from 2014 when ONS 2018 data is available. After a year when the government has exhorted, "follow the data" - (and as a lowly subject, one assumes it is the most current data available upon which they've made the many decisions effecting everyone's lives), surely it is not beyond expectations that Dacorum Council would also use the most recent, relevant data available?
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8188
<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>The Housing Delivery Strategy comment</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 ahs been unable to attend her days centre since April last year, two close relatives suffering from recent and historic trauma, running a small local business that has been busier due to more people working from home during the pandemic, and my role as a local councillor. The consultation is not very accessible or easy to digest</p>

on a screen, even for me an IT literate person who has a professional office set up at home, with a large screen/keyboard/mouse etc. For those who only have a tablet or phone it is impossible to engage in any meaningful way with the consultation. I apologise in advance for any typos - I am exhausted from all the extra work I have had to do in the pandemic due to public services being closed for a year and more people in the house and community to look after.

I am educated to MSc level, a formal Senior Civil Servant, and am computer literate - for the avoidance of doubt when reviewing my complaints about how hard you have made it to reply and engage with the process for the citizens of Dacorum.

I urge councillors and officers to take a step back and put themselves in the shoes of residents when designing huge and life-changing consultations. This has not put the council in a good light. Some local councillors have taken to social media to publicise the consultation but there was very little from the council. This consultation should have been postponed or extended to beyond lockdowns and school closures to enable a full and open review and engagement with the whole community.

We support the responses of OneVoice, Chiltern Society and the Liberal Democrat Group, among others, so I will not seek to duplicate their detailed points here, but focus on the main points of concern for a long time resident of Boxmoor, a jewel in Hemel's crown.

#### Greenfield/greenbelt

The green belt should be protected at all costs, and brownfield sites prioritised over any permanent destruction of greenbelt land. The council has said in public council meetings that they will protect greenbelt to the death but this is not what the consultation says and this is what has enraged so many residents.

#### Housing requirement and council tactics (Q1)

Too many houses, too few affordable homes.

It is absolutely clear that the number of houses supposedly held to our temples is far far too many on any rationale and evidence-based up to date analysis. The plan is woefully short on ensuring a large proportion of social/affordable housing, which is what residents of Dacorum need. The council has failed its citizens by refusing to face up to the Government and push back on the numbers. To throw the pass to the community in the middle of a pandemic with a consultation that proposes an eye-watering and irrevocable destruction of greenbelt and increase in town sizes of Berkhamsted and Tring is incomprehensible. This is an incredibly risky strategy in the middle of a pandemic when you will not have reached a significant proportion of the community die to pandemic restrictions. There are still more people in Dacorum who don't know about the consultation or its life-changing implications than there are who do know. And of those who do know, how many of them will have the time or energy to reply substantively? Please, on behalf of your residents, fight back at the government figures and listen to us. To ignore any criticism as politically motivated blinds you to listening to what we have to say *as people who live here and will live here, hopefully alongside the next generation, for the rest of our lives - decades* is rude at best and incredibly insulting and not in the interests of what's best for Dacorum at worst. Other councils have fought back, why didn't we? Why didn't you agree the tactics with the residents whose lives will be affected by the new Local Plan?

The evidence base for the number of houses needed in Dacorum should be the 2014 ONS numbers and not 2018.

#### London Road development

4 storeys max at the station.

Another case of the Council not appearing to listen...in the most recent consultation on the station development, the overwhelming response from residents was to limit any development to 4 storeys to protect the local scenery, including overlooking the ancient grazing land of Boxmoor Trust and the view of Roughdown common and the fields beyond from resident in the heart of Boxmoor village. Why does the current plan say '8 storeys or more'??? What is the point of consultation?

It is clear to anyone who lives in the immediate area or who travels along London Road to and from town and Apsley or the A41 that height is a given at the Plough roundabout and at the scarred land and buildings next to Aldi at the A41 Junction.

There is scope to develop the ugly brownfield sites along London road opposite the moor, eg around the old gas works and near the trainline between the A41 and the roundabout at Roughdown road.

The area between Roughdown Road and the station roundabout must remain low rise to protect the street scene as Hemel moves into more green land towards Box Lane. I will fight any proposal to have higher than 4 storeys along this stretch of road and at the station.

#### Who are the new homes for?

The original proposals for the station development showed apartments that were clearly for commuters, which would be certain to pull people from London into the areas and with inadequate numbers of affordable properties, would not help local people looking to get onto the property ladder.

#### Commercial/retail at the station

Lockdown has impacted local businesses heavily and the council should be very cautious about approving retail space at the station that could take business away from Boxmoor village centre or town centre, the latter having taken a huge hit from multiple lockdowns. With the town walkable for the majority of people who would live in starter apartments like those proposed for the station development and regular bus services to town, there is limited rationale to have a supermarket or too many restaurant or food businesses at the station location.

#### Sustainability/climate change

There is nothing in this plan to reassure me that we would have sufficient water to provide for all of the new homes, nor that the council is acting NOW on the climate emergency they declared. An emergency means taking action immediately and we have seen far too little action and too few ideas in this plan, contradicted by the destruction of the greenbelt etc. The council has also agreed to protect the area's unique chalk streams which are essential to maintaining a balanced ecology. These are at risk now and adding too many more houses will impact them further.

The planned housing should be carbon neutral at worst and negative at best. The plan is woefully unambitious on this.

#### Infrastructure

The infrastructure plan lacks detail on how the roads and cycle lanes will be built/improved and designed to reduce car use. The council needs to be far more proactive, imaginative and positive about designing for a low carbon future and helping residents live in uncongested places.

In summary

There is insufficient evidence of housing need to support the level of development (Q8). Full exploitation of brownfield sites for the Local Plan is not fully evidenced. So the Plan fails to meet Section 137 of the NPPF, which specifies the exceptional circumstances that need to exist to justify changes to Green Belt boundaries.

PLEASE LISTEN TO US - use the citizen's panel and have one for each area in the plan so we can co-design housing, infrastructure and space together. No one knows the area and its needs better than the people who live here.

There are so many good people who work for the council and have worked so very hard on this plan but this proposal is cloth-eared, unambitious and risks ruining the lives and the enjoyment of Hemel and Dacourm's green spaces forever.

**Included files**

**Title** The Housing Strategy

**ID** EGS8218

**Person ID** 1266154

**Full Name** Iain Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

(7): Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. **The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.**

**Included files**

**Title** The Housing Strategy

**ID** EGS8245

<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>The Housing Delivery Strategy comment</b>	<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> <p>It seems too that there is only a guarantee that as low as 10% of these homes will be built. How will the council fulfill it's obligation of 35 - 40%?</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8257
<b>Person ID</b>	1265003
<b>Full Name</b>	Martin Bishopp
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>The Housing Delivery Strategy comment</b>	<ol style="list-style-type: none"> <li>1 We don't agree with the figure of 16,000 houses as this figure comes from outdated data from 2014. More up-to-date data from 2018 would half this figure to 8000.</li> <li>2 The changes that have occurred since the pandemic have not been addressed in the plan. The potential for using brownfield sites, disused shopping areas and industrial sites should be considered.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8258
<b>Person ID</b>	1266157
<b>Full Name</b>	Samantha Bishopp
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ol style="list-style-type: none"> <li>1 We don't agree with the figure of 16,000 houses as this figure comes from outdated data from 2014. More up-to-date data from 2018 would half this figure to 8000.</li> <li>2 The changes that have occurred since the pandemic have not been addressed in the plan. The potential for using brownfield sites, disused shopping areas and industrial sites should be considered.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8262
<b>Person ID</b>	1266159
<b>Full Name</b>	Carol Hart
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Here is my response to Dacorum's Strategy for Growth Consultation.</p> <p>Tring has a friendly feel to it, surrounded by easily accessible countryside for locals and visitors to enjoy. Building on Green Belt land will damage our beautiful countryside, destroying areas important not only for humans, but where wildlife, birds and insects can thrive. Green Belt land was designed around towns to <i>prevent</i> urban sprawl. Tring is facing a 55% increase in new houses!</p> <p>Such a huge number of new houses, in addition to those already being built next to Tring Cemetery, will cause traffic congestion and pollution at a time when we should all be thinking more about our environment.</p> <p>The government is not taking into account and does not care how this scale of housing will affect those already living in Tring. I hope that Dacorum Borough Council does. There are not sufficient jobs for such a housing development, again more pollution and traffic as people commute out of town. It will put a huge strain on local facilities. As we have seen in many areas of the country, these developments do not mean affordable housing for locals unable to get a foot on the ladder. It means large expensive houses for people who can easily buy such housing already in existence.</p> <p>In certain areas of the north east of England, high quality houses have been knocked down because high unemployment has caused people to move away, creating ghost towns. This will be the same in other areas where once there was high employment. Why is the government not investing in employment in these areas which already have the housing and need their communities back? These are the questions I would like our local council to ask this government, rather than accepting the housing quota for Dacorum.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8268
<b>Person ID</b>	1266165
<b>Full Name</b>	Nicky Kaleniuk
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>The Housing Delivery Strategy comment</b>	<p>I have lived in Apsley for 16 years and in that time I have seen a lot of changes, and a loss to a lot of green areas surrounding the village.</p> <p>The local plans for the area, and of boxmoor do nothing to alleviate my worries about this, and fills me with dread!</p> <p>The roads around apsley and boxmoor are gridlocked a lot of the time, there are school place shortages and mite and more of the green spaces are being built on.</p> <p>The proposals to build up to 8 storey buildings around the Boxmoor trust area near the station will seriously damage the look and feel of the place, and will have a detrimental affect on the traffic congestion, air quality and noise pollution spoiling an area of outstanding beauty enjoyed by all of the local residents.</p> <p>The housing that is being built at the moment in these areas is too expensive for most local residents and attracts more and more people moving out of London which does not then help the young people in our town who are on housing lists and need properties to rent.</p> <p>There are not enough school places for all of the children on the new Aspen park estate as it is, meaning that children have to get in card to travel to school exacerbating the problem of local traffic at peak times.</p> <p>Soon I fear that there will not be anywhere for us to walk our dogs without getting in a car to drive to places instead of being able to walk from our houses as all of the green spaces are disappearing.</p> <p>Please consider residents views and stop the overdevelopment of this wonderful area.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8273
<b>Person ID</b>	1266166
<b>Full Name</b>	Martin Scicluna
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	I have lived in Potten End for over 28 years and I wish to register my concern about the above plan.

Potten End suffers regular electrical power cuts because of a substation which is not fit for purpose; it's water pressure is poor, I've had Affinity Water confirm it is at the lowest level acceptable to the Regulator; it's roads especially Hempstead Lane are too narrow to cope the current traffic.

So, additional housing in the area will exacerbate the problems suffered by Potten End residents.

Berkhamsted traffic is often, pre lockdown, at a complete stop as the roads can't cope with the volume - the inconvenience and inefficiencies suffered by the residents of the town and surrounding areas will multiply if additional housing is built as proposed.

I trust that these and similar views are taken into account and that the Plan is rejected.

**Included files**

**Title** The Housing Strategy

**ID** EGS8278

**Person ID** 1266168

**Full Name** Lisa McNamara

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

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** The Housing Strategy

**ID** EGS8279

**Person ID** 1266169

**Full Name** Sarah Knowles

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

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** The Housing Strategy

**ID** EGS8285

**Person ID** 1266170

**Full Name** Philip Hill

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

Please take this email as my formal response to Dacorum's Local Plan (2020-2038) Emerging Strategy for Growth.

I do not agree that 16,000 houses should be in the plan and believe you should be using up to date figures which would halve that number to around 8,000 houses.

The current pandemic has shown how important our local green spaces are and that our green belt land must be protected. I do not believe that inflated housing need is an exceptional circumstance for removing Dacorum's green belt.

Green belt land helps protect the shape, size and character of towns and villages preventing them merging into one another.

This plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home.

The plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses. We currently have no hospital, functioning police station or sufficient schools & residents parking.

I understand that we don't have enough water to supply all the extra houses. I believe from what I have read that the extra water needed can only be extracted from the chalk aquifer which in turn will damage the borough's chalk rivers which are classified as priority habitats by the Natural Environment & Rural Communities Act 2006.

I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

**Included files**

**Title** The Housing Strategy

**ID** EGS8291

**Person ID** 1266171

**Full Name** Patrick and Gillian Wilks

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

We wish to object to the plan for the following reasons.

- 1 Although emphasising green spaces the plan increases housing by 25% and uses 2000 acres of valuable Green Belt and open spaces across the borough. If Covid has taught us anything it is that Green spaces are vital and must be kept in our local community.
- 2 Impact on Green Belt & Chiltern area of Outstanding Natural beauty (AONB). The scale of the proposed housing will have a detrimental impact on the natural environment
- 3 Underestimating Brown field potential (Q2 of consultation). Although the plan includes some brownfield suites the major housing developments are on the outskirts of Hemel, Berkhamsted and Tring. The plan fails to take into account the impact of Covid and recent working from home changes; in the near future more office and work sites may become available.
- 1 Unsustainable development (Q3 of the consultation) Focusing building on the outskirts of the main towns means that the developments are some distance from existing transport infrastructure. This will result in several thousand more cars on local roads.
- 2 More congestion on the roads, particularly impacting Potten End. The plans suggest traffic coming from Tring and Berkhamsted would use the new link road in North Hemel from the Dagnall road (B440) to J 8 on the M1, rather

than using the old link road through Hemel. This is so close , the new link road is an unnecessary addition. Also there is no way for the traffic to get to the A41 From the B440. The route would take you up through Potten End and then the narrow streets of Berkhamsted. The leight on buzzard road is often queuing in the rush hour times at the moment especially to go over the bridge at Water End. The proposal would worsen this situation. It is unacceptable.

- 3 Water supply and waste water disposal (Q6 ) The chalk aquifer is already over abstracted and local residents are aware of the fragility of the water supply. The level of the new housing will put a severe strain on supply and disposal. There is the potential to damage the boroughs precious chalk streams. Dacorum and affinity water have recently spent time and money on improving the River Gade only for this plan to put it at risk.

We strongly object to the number of houses and the Motorway link proposed. The plan is based on figures the the government has now withdrawn. The plan should be based on the most recent ONS figures from 2018 which suggest a housing target for Dacorum of c. 500 houses pa, this is half the figure on which the plan is based.

**Included files**

**Title** The Housing Strategy

**ID** EGS8296

**Person ID** 1266172

**Full Name** Mr and Mrs P.C Pegrum

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

We have lived in Tring for 40 years and have seen a lot of residential building projects taking place during this time and understand that all towns must support growth and development in an appropriate way. We cannot see how increasing a small market town like Tring by 55% (2,731 houses are planned) is a balanced proposal.

We only received the brochure for us to review a couple of weeks ago and this is not sufficient time for anyone to really research and reply to this proposal, but we felt that we must say something. Some of our neighbours did not receive a copy of the brochure and so we are concerned that this omission may have occurred elsewhere denying a full and satisfactory number of comments being received to judge what is right for the residents in the surrounding villages/towns.

Also because of the Covid-19 situation, we have been unable to attempt to meet with other concerned local people and have a consultation with yourselves face to face as indeed we have done in the past (Tring relocation of local dump site and also when there were concerns about increase in flights from/to Luton London Airport) and to register our concerns/opinions. We have not been able to meet with residents in the High Street and distribute leaflets about the proposal to ensure that most residents are aware of what is happening.

These are just a couple of concerns that my family has.

However of most concern is the planned erosion of the Green Belt in the Borough and AONB. Surely the Council should be seeking other more suitable areas to build upon before developing homes on Green Belt - the definition of which I state from the Government's document Paragraph 133 which says "the Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land PERMANENTLY OPEN; the essential characteristics of GREEN BELTS are their openness and their PERMANENCE". Clearly that means that the DBC are working in complete contradiction to the Government's National Planning Policy Framework specifically in the protection and unnecessary development of GREEN BELT land. Surely this is something that the Council Members must need to address before someone decides to pursue this within a legal framework as environmental groups have done with regards to HS2 and how much money would be wasted with court appeals and legal costs yet achieving nothing for everyone concerned.

Surely it would be worthwhile for a postponement of any planning considerations at the moment (Covid-19 lockdown restrictions) until the parties concerned (various local concerned groups, etc.) can meet and liaise with the DBC planning council and hold a meeting that can be positive for all parties involved.

My family have read the recent Response by the Chiltern Countryside Group and fully support the broader points made by them.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8300
<b>Person ID</b>	1266173
<b>Full Name</b>	Kate Nolan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>The Housing Delivery Strategy comment</b>	<p>SAVE ONE TREE HILL, NORTHCHURCH</p> <p>One Tree Hill is the name that my family and I have used for the proposed development site in Northchurch (or 'West Berkhamsted' as it is referred to in the planning document) for the 40 years that I have lived here. My children love the fields as much as I do and we enjoy looking out at them and watching how they change throughout the year.</p> <p>I would like to lodge my objection to the proposed plans to build on this land.</p> <p>I believe that these proposed developments in Northchurch, as well as obliterating our precious green spaces, which are so important to all of us for our mental and physical wellbeing, will also put extraordinary pressure on the local environment and residents in terms of traffic congestion and access to local services.</p> <p>Northchurch is loved by all of us who live here for its beautiful views, its calm and quiet pace and its village feel and identity. I believe that these plans will unnecesairly obliterate this for all of the current residents. The plans have failed to even identify Northchurch as its own village.</p> <p>I have only very recently become aware of these plans and am very surprised that today is the final day to respond, especially given that we are all still in a full national lockdown.</p> <p>I would urge the council to delay these plans to allow for proper consideration and feedback from residents.</p> <p>My personal feelings are that insufficient value has been put on this Green Belt land in terms of its impact on the mental and physical wellbeing of the existing residents of Northchurch. The number of houses proposed is not justified by the latest statistics and the needs of the local community should be put above the desire to make money out of destroying this beautiful and historic land.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8322
<b>Person ID</b>	1207813
<b>Full Name</b>	Graham Hale
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

**The Housing Delivery Strategy 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 MI/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**

**Title** The Housing Strategy

**ID** EGS8326

**Person ID** 1266176

<b>Full Name</b>	Francesca Ryde
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I write to you regarding the Proposed Development in Long Marston for over 3,000 houses.</p> <p>Have you thought about the local infrastructure? The small country lanes already smothered in pot-holes, large vehicles ruining verges, encroaching on the ditches (to MINIMISE FLOODING), destroying wildlife? What about the farms already there, for hundreds of years, actually sitting on FLOOD PLAINS? What about the schools, the doctors surgery's, the already at capacity local hospitals and tiny train stations barely able to meet current capacity? The list could could go on, but I am aware we are VERY SHORT OF TIME.</p> <p>Quite frankly this is ridiculous and has not been diligently thought through. As for the timeframe of LESS THAN A WEEK for objections to be raised and informing the landowners; it is an utter disgrace. You may have pressures from higher powers but seriously, have you not thought beyond that? You clearly have no heart for the people you are supposed to look over. Livelihoods will be lost, generations of farming destroyed, wildlife killed, local workforce's crippled, current locals needs disregarded, all for you to 'meet targets'. Good luck when the rain comes is all I can add. We live on clay!</p> <p>I urge you to reconsider your planning and your ultimatum timeframe. Have a heart.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8341
<b>Person ID</b>	1157311
<b>Full Name</b>	John Thomson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

- \* Yes
- \* No

**The Housing Delivery Strategy comment**

As a resident of Kings Langley Parish, and therefore of Dacorum BC, herewith my comments, albeit at the 11th hour. I merely wish to make four points in this email form:-

- 1 I have tried to follow Government dialogue on required national housing numbers but, as well as being confused, one conclusion stands out - the numbers are unnecessarily over-estimated. Inter alia they do not appear to have taken into account a lower housing requirement following Brexit and the current pandemic, particularly having regard to Government strategy to put greater emphasis (levelling up) into the north of the country.

Therefore, the proposed average target of 922 pa new dwellings is in my opinion too high. In reality, a lower target will result in a reduced need (if any) to encroach on sacrosanct green belt.

- 1 I personally object to the release of any green belt land for housing or other development - the UK does not face a housing crisis, it faces a population/immigration crisis which needs addressing. I am pleased to note that the Council has not carried forward the unjustified release of green belt land at Shendish (including the golf course), Wayside Farm at KL, and Hill Farm at KL, and I feel the Council should try harder to meet its (reduced) targets from brownfield sites, non-green belt, yet-to-become sites, and from "windfalls" that will continue to arise.

- 1 KL has "done its bit" towards the development expansion of the borough, by way of the pressure from (a) recent housebuilding (I am advised that since the last local plan (2002) approx 3500 new dwellings have been accommodated in KL and the surrounding area), (b) the proximity of Three Rivers which appears to be allowing much construction in its borough abutting KL whereby the occupiers will look more to KL for their services, and (c) the possibility of an enlarged J20 M25 becoming busier with a Moto motorway services area, etc

- 1 I even object to the release of green belt at Rectory Farm, but if such is the price to be paid to keep a balance within the borough so be it. The A4251 is becoming congested at times, especially at the Apsley end, and further development at Rectory Farm will increase coalescence between HH and KL. On a point of principle, retention of green belt inter alia to obviate coalescence must be respected and not gradually eroded.

**Included files**

**Title** The Housing Strategy

**ID** EGS8523

**Person ID** 1266463

**Full Name** Steve Allen

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I write to place my objections to the Dacorum Local Plan Emerging Strategy for Growth (2020-2038) on four grounds:</p> <ol style="list-style-type: none"> <li>1. The Local Housing Need (LHN) would appear to be over inflated when compared with ONS data.</li> <li>2. The plan does not cater for any house builds already being planned/built. It assumes there is no current activity.</li> <li>3. The longer term impact of Covid on housing requirements are not known</li> <li>4. The plan would appear to be at odds with Dacorum's stated Local Plan Objectives, namely conserving and protecting the natural environment.</li> </ol> <p><u>Point 1</u></p> <p>According to atlas.hertslis.org, a site which is reached from the hertfordshire.gov.uk website, the current population in Dacorum is 156,000 as of 2021 and is projected to rise to 170,000 in 2036 and 174,000 in 2041. I'll assume that 2038 will have a projected population of 172,000. The difference between 2021 and 2038 is therefore an increase of 16,000. The number of households in 2021 is 66,000 rising to 75,000 in 2036 and 77,000 in 2041. Splitting the difference the net growth in households is 10,000 over the 17 year period, equating to a gain of just under 590 houses per year. This implies an average household size currently of 2.36 people (which tallies up to the 'official' stats), falling to 2.26 people in 2038 (the 'official' stats have 2.28 in 2036 and 2.25 in 2041).</p> <p>In comparison, the LHN suggests an increase of 1,023 houses per year for every year, meaning 17,400 new houses are needed over the period to house what they believe to be an increase in population of 31,724 people. So my question is why are we taking these figures as gospel when Hertfordshire's own statistics are wildly different? We are taking of a difference of almost 100%. Given the figures are so significantly different, would it not make sense to go back over the stats to prove one way or another before its too late? The genie is still in the bottle but once its out, there's no going back.</p> <p><u>Point 2</u></p> <p>Throughout the plans there seems to be no allowance being made for new house currently being built. Bearroc Park in Berkhamsted, for example, is phase 2 of a development not yet built. The plans as they stand only count the current population and current housing stock, and then project forward making the assumption that no new houses are coming on. Shouldn't these fit in to the calculations somewhere?</p>

### Point 3

Covid has had a significant impact on many lives in ways that are too early to predict. Businesses are going to the wall and death counts are high, both of which are negative impacts on the requirement for housing stock. This is a once-in-a-lifetime external 'shock' to the system so why not wait to see what is needed? With the High Street needs changing rapidly, there could be plenty of opportunity to repurpose offices and shops to be flats. Looking at the projections, it suggests that new housing stock will on average only have 1.6 people in them to get our average down to 2.25 in 2041, so this would be a quick and easy way of alleviating pressure on the amount of housing. I understand that it has been suggested to repurpose the empty Debenhams in Hemel Hempstead already which makes perfect sense. There is bound to be more and more brownfield sites coming up that could help further

### Point 4

One of the 8 stated aims of Dacorum is to conserve and protect the environment. By allowing huge swathes of Green Belt land to be swallowed up this can't be seen to be conserving the environment. With specific reference to the plans in Berkhamsted, it also does nothing to promote and facilitate sustainable transport and connectivity as the already choked high street will only get worse.

The population density of England as a whole is 4.1 people per hectare (pph). The density of Dacorum is 6.8pph. Berkhamsted ranges across its wards between 99pph and 150pph. It seems madness to try and shoehorn more people into an already densely populated area.

I want to offer a solution rather than just a problem. If down to me:

- (a) Wait for 12 months to see what happens as a result of Covid
- (b) Jump at the opportunity to factor in new brownfield sites into the calculation e.g. Debenhams
- (c) Factor in in-progress housing starts into the calculation
- (d) Go over the numbers and get agreement which numbers are correct and are valid to base assumptions for planning purposes
- (e) If large numbers of housing is still required, build a completely new town – at 6.8pph that implies there is a large amount of spare land out there. Building from scratch means you don't have to retro-fit any capacity infrastructure to cater for new houses. Upgrading infrastructure for existing towns will be extremely difficult and likely to be a painful experience for the rest of the population. Doing it on a blank canvass means very few are affected.

#### **Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8524
<b>Person ID</b>	1266464
<b>Full Name</b>	Sara Willis

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>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:</p> <ul style="list-style-type: none"> <li>* When the Government changed it's policy Dacorum should have changed it's Strategy, instead the housing quotas were bolted onto work already done.</li> <li>* 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.</li> <li>* Too many houses where there are too few local jobs.</li> <li>* 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.</li> <li>* <b>Tring and Northchurch</b> 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</li> </ul> <p>The above points raise huge concerns to the future of Dacorum and must be addressed before it is too late!</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8525
<b>Person ID</b>	1266465
<b>Full Name</b>	Luciano Sozzo
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>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:</p> <ul style="list-style-type: none"> <li>* When the Government changed it's policy Dacorum should have changed it's Strategy, instead the housing quotas were bolted onto work already done.</li> <li>* 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.</li> <li>* Too many houses where there are too few local jobs.</li> <li>* 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.</li> <li>* <b>Tring and Northchurch</b> 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</li> </ul> <p>The above points raise huge concerns to the future of Dacorum and must be addressed before it is too late!</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8526
<b>Person ID</b>	1266466
<b>Full Name</b>	Matt Leach
<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>The Housing Delivery Strategy comment</b>	<p>The consultation period for the Emerging Strategy for Growth (ESG) began on the 5th of November 2020. Meaning the plan was written before that date.</p> <p>This was prior to the Ministry for Housing, Communities &amp; Local Government, and The Rt Hon Robert Jenrick MP announcing, on the 16th December 2020, a shift away from building in suburban, semi-rural, and rural areas, to cities. These dates, and the reasons behind the shift to cities, are critical when assessing the ESG itself and the motivations behind it.</p> <p>The ESG is designed to meet targets that no longer apply. They do not apply because they have been acknowledged as being harmful.</p> <p>The Minister’s December policy shift, and the evidence that led to it, clearly shows that a spread into greenbelt areas is unnecessary; it is harmful to the local environment and to the people who live there. However, investing in cities helps to tackle unaffordability, while also helping to stimulate the recovery of local economies, including high streets post Covid. As part of the policy shift, the 80/20 rule has been revised to remove any London and South East bias for development.</p> <p>This aligns with the aspiration to “level-up” all parts of the country, rather than favouring more affluent areas that generate higher profits for developers, but clearly exacerbate socio-economic disparities. That’s why £67million has been allocated to identifying sites in the West Midlands and Greater Manchester, and £100million has been invested in a Brownfield Land Release Fund to avoid the unnecessary and harmful spread into protected greenfield areas.</p> <p>Yet 37% of the proposed houses are in rural and semi-rural settings. 35% of the planned housing is on greenbelt land. (With provision for a further 4,000 dwellings beyond the planned period).</p> <p>Given the ESG plan itself suggests that 85% of the borough is countryside, and 60% of that is greenbelt, it seems clear that the Dacorum plan is out-dated, unlawful, and neither in the local or national interest.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8528
<b>Person ID</b>	1266467
<b>Full Name</b>	Mr and Mrs D Bowra
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS8544
<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> * <b>Yes</b> * <b>No</b>	Yes

<b>The Housing Delivery Strategy comment</b>	<p>DBC have accepted a huge housing target but having done so it has just looked at the map for places to put them. But it is a target - it is not an instruction nor an obligation. The impact on Tring in particular is enormous. DBC underestimates windfalls ignoring even Government estimates of the effect of the pandemic. Realistic assessment of the windfalls (as shown by BRAG) vastly reduces the need for encroachment into the Green Belt.</p> <p>DBC should release all of the land in HH01 and HH02 now in alignment with the Core Strategy 2013.</p> <p>Why should this be deferred until 2023? What is the reason?</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8571
<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>The Housing Delivery Strategy comment</b>	<p>Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8596
<b>Person ID</b>	1266584
<b>Full Name</b>	Harry Bennie
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>&gt; Re Local Housing plan for Dacorum</p> <p>&gt;</p> <p>&gt; I have grown up with this beautiful view for 18 years now and strongly disagree with the plan for the type and number of additional houses in Berkhamsted and Tring.</p> <p>&gt;</p> <p>&gt; I, like most people on this estate, love our houses because of this very view and easy access to the stunning countryside which keeps us all fit, healthy and now sane.</p> <p>&gt;</p> <p>&gt; 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>&gt;</p> <p>&gt; 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.</p> <p>&gt;</p> <p>&gt; This proposal needs revisiting in order to get the support of the local community.</p> <p>&gt;</p> <p>&gt; As it stands, it is simply unacceptable to us ALL.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8668
<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>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8695
<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
<b>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8718
<b>Person ID</b>	1266741
<b>Full Name</b>	stephen 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>The Housing Delivery Strategy 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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8750
<b>Person ID</b>	1266759
<b>Full Name</b>	Claire Fineran
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I am extremely concerned about:</p> <p>*the scale of the development proposed, in Berkhamsted and Tring in particular. The amount of housing proposed and on greenbelt land will simply destroy these and the surrounding local areas and strip them of the very reason they are attractive places to live.</p> <p>*the validity of the numbers arrived at. My understanding is that the initial government requirements have since been reconsidered and yet this plan has not. That seems entirely flawed and a very poor reason to decimate an area.</p>

\*loss of the greenbelt land, impact on the Chilterns Area of Outstanding Natural Beauty and more broadly the environmental impact of loss of green land at a time when we face a climate emergency.

\*lack of consideration of other sites such as brownfield regeneration which would not have the same devastating environmental impact.

\*failure to address the infrastructure required to sustain such significant development. Local infrastructure is already stretched by the development that has already taken place. The proposals do not sufficiently address, in detail, the additional schooling, medical and transport requirements that these developments would need.

\*poor quality consultation. At a time when it is mandated people 'stay home', the only way to give people valid notice of these proposals would be by post to each home. That has not happened and those impacted (the entire towns not just those neighbouring the development sites) have not been duly consulted.

\*lack of real recognition of the needs of future generations - affordable housing (which these developer led schemes do not offer) with supporting infrastructure (not sufficiently addressed in these plans) and open space so vital for health and well-being (as this pandemic has so recently taught us and which these proposals destroy).

These plans, if passed, will simply decimate these areas beyond recognition. They are unacceptable for the reasons specified above.

**Included files**

**Title** The Housing Strategy

**ID** EGS8778

**Person ID** 1266779

**Full Name** Anna Peters

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** 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, yet the council has failed to relook at the numbers and are therefore hugely overestimating the number of homes needed. More accurate estimates suggest in the region of 355 houses are needed in Dacorum per year- almost a third of the target set by the council. Local restrictions, greenbelt and circumstances have not been considered and the governments figures are a guide NOT a target.

The Greenbelt should be protected for all but “exceptional” circumstances- of which there are none.

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 defeats the point of the targets entirely and is totally biased.

As a resident of a private road off Swing Gate Lane I am extremely concerned about the proposals to irreversibly damage the character and beauty of the towns greenbelt, along with the consequent destruction of natural habitat for wildlife as well as damage to rural green space. Not to mention the opportunities for fresh air and exercise for local residents.

The proposal to build houses represents a 24% growth in houses in Berkhamsted and a 30% growth in urban footprint fundamentally changing the rural and countryside character of the Berkhamsted borders. Which would be tragic.

Development on this scale will place overwhelmingly pressure on local infrastructure, particularly the local highway network.

**Included files**

**Title** The Housing Strategy

**ID** EGS8845

**Person ID** 1266793

**Full Name** Tony Ayles

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

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 the current and future infrastructure will put a strain on the community.

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** The Housing Strategy

**ID** EGS8848

**Person ID** 1148361

**Full Name** Joy Kingsbury

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

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 the current and future infrastructure will put a strain on the community.

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** The Housing Strategy

**ID** EGS8853

**Person ID** 1266799

**Full Name** Karen Kelly

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>We are against this happening for multiple reasons from there being plenty of room in Hemel Hempstead that could be developed to accommodate housing.</p> <p>Also looking at your map one of the areas proposed to build on regularly floods which I have photos of because I live near by.</p> <p>If you build on the green belt it will reduce areas that can be grown on for food.</p> <p>It will also affect the eco system.</p> <p>I the current climate it would be increasing admissions/carbon dioxide to the are when we should be doing more to reduce it.</p> <p>According to you plans the local allotment will be built on when there is a 1900s law stating if 12 or more people want an allotment that this should be provided for them.</p> <p>There is also not enough school or hospitals ect in Hemel Hempstead to cope with these extra houses.</p> <p>The roads in the area are all read heavily congested</p> <p>To be honest the hole thing is ridicules.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8857
<b>Person ID</b>	1266801
<b>Full Name</b>	Jane Oliver
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

<b>* No</b>	
<b>The Housing Delivery Strategy comment</b>	<p>This plan must be reviewed.</p> <p>I live in Berkhamsted and am extremely concerned that a plan is slipping in which takes no account of resident's views. Too many houses are planned.</p> <p>Dreadful destruction of Green Belt</p> <p>Threat of overwhelming the local resources and facilities.</p> <p>Rethink this plan with consideration of the above concerns and the views of the residents and voters.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8864
<b>Person ID</b>	1266808
<b>Full Name</b>	Fran 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>	
<b>The Housing Delivery Strategy comment</b>	<p>I cannot support the Dacorum local plan for the following reasons:</p> <ul style="list-style-type: none"> <li>• Too much building has been proposed on Green Belt Land. More brown field options should be explored.</li> <li>• The growth proposals for Tring are completely disproportionate, unjustified and lacking in valuing its surrounding environment and landscapes.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8870
<b>Person ID</b>	1266814
<b>Full Name</b>	Eric Juster

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy 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. 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>Title</b>	The Housing Strategy
<b>ID</b>	EGS8881
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS8882
<b>Person ID</b>	1266819
<b>Full Name</b>	Elizabeth Preston
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	I have read over the planning proposals for Berkhamsted and am very concerned. The amount of amount of housing you are building is unacceptable. There will be no green land left and local nature will be affected with danger of the red kite birds being made extinct in the wild once again, schools don't have the capacity, roads will be at a standstill. I can't understand why you are building so many homes in the local area!! It's a ridiculous number and should be cut down!
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8889
<b>Person ID</b>	1266829
<b>Full Name</b>	David Thomas
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I oppose the Dacorum Local Plan.</p> <p>The scale for development is excessive.</p> <p>Tring is already struggling meeting a suitable infrastructure with the current population level. This proposed development will put pressure on roads, schooling, surgeries etc.</p> <p>Tring is a small market town in an area of natural outstanding beauty surrounded by green belt. This development will destroy the lovely vista from the ridgeway and Aldbury Nowers.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8895
<b>Person ID</b>	1266826
<b>Full Name</b>	Nigel Squire
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>In line with the request for comment about local development. Please note that the current infrastructure is not adequate for additional housing. For example, the water pressure on the hills to south side of Berkhamsted is already low, and in during the summer when there is high demand the water from taps attached to the mains is little more than a trickle. Additional demand from additional housing would exacerbate the problem. Should there be a fire on the south hills, there may well be inadequate water pressure to control the blaze. I oppose the further development of Berkhamsted.</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8897
<b>Person ID</b>	1266835
<b>Full Name</b>	Stef Wade
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I am a resident of Northchurch Common . An area of outstanding natural beauty , nestled in the Chiltern Hills , in the Greenbelt .</p> <p>I am writing to log my objection to the proposals contained in the DBC emerging strategy for growth plan .</p> <p>The sheer size of the housing proposal(16.8k houses) is very worrying .</p> <p>400 new homes in Northchurch itself . This will destroy the village entirely . It will become a suburb of Berkhamsted . It is not West Berkhamsted. It is a village that dates from Roman times. It is flanked by 15th and 16th century almshouses . But now under the DBC plans it will become a huge traffic jam ! The main road A4251 is already heavily congested at key times of day creating unacceptable levels of air pollution . Northchurch children are already subjected to the poor air quality on their way to and from school . The increased traffic also raises the safety concerns , more parents will drive their children - compounding the traffic issues .</p> <p>I believe that the Greenbelt was conceived and made law to protect rural England from urban sprawl .I cannot see that DBC have proved it necessary to build on it. Have they exhausted all brown field options ? I don't think so. Post pandemic offices in towns will remain empty , as people choose to work from home - and business choose to cut costs.</p> <p>Our village life and Greenbelt are paramount to our mental health- our British wildlife and our planet !!</p> <p>New Road ( Northchurch to Ashridge) has a small one way Victorian bridge spanning the canal. This is close St Mary's school . It suffered already with increased traffic . When the M1 is problematic drivers take a scenic route bringing them across the hills down into Northchurch over this bridge to access a41 . Anymore traffic will undoubtedly present a danger .</p> <p>In summary the DBC proposals</p> <ol style="list-style-type: none"> <li>1 Ignore that residents love the area - as it is , a village , surrounded by ancient countryside , with rare and unfettered views.</li> </ol>

- 2 The DBC proposals have a cavalier attitude to the Greenbelt principle. It is in existence to protect areas like ours from urbanisation .
- 3 Not considered sufficiently the impact of air pollution .
- 4 DBC proposals seem to be ploughing on regardless despite the massive number of homes needed generated by central government has been revised , as the algorithms were proven incorrect . This explosion of new homes is based on 2014 projections . Get the numbers right !
- 5 Big question around if any of these homes will be affordable for families not already on the housing ladder .

I URGE DBC to think again on this proposal . And come up with a solution more fitting for this area. These decisions are irreversible . Our natural environment and wildlife are precious and the Greenbelt is there to ensure our children and grandchildren can enjoy it.

I don't want urban sprawl and air quality below guidelines. Build suitable homes in suitable areas with infrastructure properly considered .

**Included files**

**Title** The Housing Strategy

**ID** EGS8899

**Person ID** 1265568

**Full Name** JOHN SHULVER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

There is nothing about doing more to empty homes - the government estimates in excess of 600,000 empty homes in the UK and homeless charities claim more.

These developments will put further strain on local infrastructure, such as health and wellbeing, whilst at the same time removing easily access able green spaces for many, schools health and medical services.

Also, in this Post brexit world, the population is dropping, combined with the tragically high covid deaths, there may well now be a reduced (or different, in terms of what is built) need for housing and before committing to destroy the wonderful green belt around Hemel (& other towns) I strongly suggest that the local housing need be re assessed in light of what has happen in the last 18 months.

Please consider these points, along with other objections before deciding upon the plans you are currently promoting.

**Included files**

**Title** The Housing Strategy

**ID** EGS8910

**Person ID** 1266846

**Full Name** Carla Michalik

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* **Yes**

\* **No**

**The Housing Delivery Strategy 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** The Housing Strategy

**ID** EGS8913

<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> * Yes * No	
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS8920
<b>Person ID</b>	1266855
<b>Full Name</b>	Judy Barnes
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>As a resident of Berkhamsted I find these proposals heart breaking.. A 24% increase in housing development would destroy the local, environment for human and wildlife inhabitants alike and is based on out of date (2014) projections which are now deemed to be reduced. Furthermore, the recent developments in, for example, Shootersway and Durrants Lane have already destroyed wildlife habitat and are not the required “affordable” housing which is needed. The government’s definition of affordable is way beyond the means of those most in need. Existing brownfield sites and vacant high street properties (which are likely to increase further in the current economic climate) should be used instead.</p> <p>The climate emergency and biodiversity loss has been completely ignored in these proposals and this is the greatest tragedy facing us all. Habitat loss due to housing development can never be replaced and the suggested narrow strip beside the A41 is laughably inadequate - it does not even include wildlife tunnels and already the roadkill along the A41 is horrendous.</p> <p>Air pollution due to traffic in Berkhamsted and Northchurch is already very serious and sometimes above permitted legal limits and has become worse since the introduction of the 2014-2018 Air Quality Act. As a valley town the surrounding open spaces are our lungs and every schoolchild knows that it takes many years for newly planted trees to contribute to significant carbon capture. As is well known, air pollution is now legally recognised as a cause of death - does DBC want this on its conscience?</p> <p>Potential water supply problems were identified by the outdated 2011 survey and the population has greatly increased since then and the proposed developments would obviously make that worse.</p> <p>The local infrastructure cannot support further population increase. Schools are already over-subscribed and existing healthcare provision is under extreme pressure.</p> <p>GP practices in Tring and Berkhamsted have now merged and Tring is facing even greater development and population increase. The Gossoms End practice has 6 parking spaces! Hospital provision is also inadequate and difficult to access as are all aspects of social care.</p> <p>These proposed developments are on Greenbelt land and contravene official government policy.</p> <p>These proposals would make life immeasurably worse for those of us who live here and the prospect of Berkhamsted, Tring and Aylesbury becoming a hideous suburban sprawl would not make the area attractive to prospective residents.</p> <p>If we do not deal with the climate emergency and fail to work with nature instead of destroying that of which we are a part, there is little point in anything else. DBC should abandon its short term political ambitions and pressure from developers and have the courage to take a long term view in the interests of all. The recent comprehensive report from the Council for the Protection of Rural England must be understood and acted upon. Among many others, I will personally vote for any party which commits to abandon DBC’s proposals and adopt a sustainable, environmentally friendly policy.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8947
<b>Person ID</b>	1266884
<b>Full Name</b>	TOM & CLAIRE DOUGHERTY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>1.The Number of Proposed houses.</b></p> <p>The housing projections are based on out-of-date statistics. The number of proposed houses within the development plan were developed by an algorithm rather than actual requirements. The latest projections from the Office of National Statistics says that <b>355</b> dwellings per year for Dacorum are required, but the development plan is putting forward for <b>922</b> developments or possibly over 1000 developments per year depending on the algorithm of choice at the time!</p> <p>The National Planning Policy Framework also expects local authorities to use the latest available information rather than an algorithm and again using the most recent official government projections, from 2018, should result in a housing need calculation that is less than half of that currently proposed in the plan."</p> <p>It's obvious that the proposed number of houses is just not required or suitable for the Dacorum area. The plan is also flawed as it will not be dealing with a case of supply and demand, as it will not be addressing affordable housing need, it will merely relocate people from London and other affluent areas.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS8979
<b>Person ID</b>	333288
<b>Full Name</b>	Mrs Julia Boyce
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I hereby wish to register my objection to the Dacorum Local Plan and especially to the proposals for Berkhamsted and Northchurch. The impact on the town will be disastrous: it does not have the infrastructure to support so many additional dwellings and will lead to pollution, congestion, lack of road safety and an adverse effect on local ecology and the health and well-being of local residents.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9006
<b>Person ID</b>	1266985
<b>Full Name</b>	Mr Andrew Bryant
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>In response to the consultation process, I am writing to formally note my OBJECTION to the Local Plan 2020 – 2038, ‘Emerging Strategy for Growth’.</p> <p>I have lived in Northchurch Parish for over 20 years and thus my objections are primarily based on my local area.</p> <p>And as a resident of Northchurch, I am shocked and disappointed by the lack of attention to detail shown by the DBC officers who have compiled the Local Plan, whereby Northchurch does not appear to even be referenced in the Local Plan and is merely part of West Berkhamsted. This is just one example of the unprofessional, rushed, and ill-thought through approach taken in the Local Plan.</p>

Specifically, I am objecting to the Local Plan on the grounds of:

- **Building on the 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.

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]

Building on the green belt fields between Darrs Lane and Bell Lane will see precious open green spaces lost forever and would dramatically transform the rural landscape of the green, valley hillsides that are characteristic of Northchurch.

- **Traffic gridlock:**

The huge housing developments proposed for Tring and Berkhamsted and the 400 houses planned for Northchurch will cause gridlock in Northchurch High Street as well as the B4506, New Road, which is a major route from Northchurch through Ashridge to Dunstable.

The 60 houses planned for the tiny strip of land at Lock Field on the B4506 is untenable: the small, single-track road that goes over the historic canal bridge is already overburdened by the current heavy levels of traffic.

- **Climate emergency issues have not been addressed:**

I believe climate change, biodiversity and well-being should be at the centre of the plan: they are not, despite the fact that Dacorum Borough Council declared a climate emergency. The Local Plan is prioritising economic growth and building on the green belt over considerations for the climate emergency. It has not taken into account legislation and recommendations from many organisations on how carbon reduction plans have to be a key, integral part of the development of local plans. In Northchurch, we are part of the Chilterns AONB and this should be respected and integrated into any plans.

- **Water supply and sewage systems**

The water table and water supply in Northchurch are already under huge pressure and the precious River Bulbourne chalk stream is already threatened. The extra housing proposed by the Local Plan would require substantial investment in infrastructure improvements in order to transport and treat wastewater and sewage and I do not believe this has been taken into account.

Thank you for registering my Objections to the Local Plan 2020 – 2038, 'Emerging Strategy for Growth'

**Included files**

**Title** The Housing Strategy

**ID** EGS9008

**Person ID** 1267005

**Full Name** Ms Kirsty Macdonald

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**The Housing Delivery Strategy comment**

As a resident of Northchurch and Berkhamsted I am completely opposed to the proposed plans of more than 2200 houses to be built in the area detailed in the strategy for growth local plan -

- 1 The number of houses proposed has been shown clearly by local groups to be more than are needed and our infrastructure will not support this plan.
- 1 We will lose precious greenbelt in the area which will have a huge impact on the countryside and environment especially in the Northchurch/ canal site / river bulborne area.

1 Northchurch itself is a small village already with a traffic problem. The centre and area around the school will be negatively impacted not to mention the ruin of a beautiful area with the wildlife around the canal and walks which would be compromised by the plans for the lock field site.

**Included files**

**Title** The Housing Strategy

**ID** EGS9011

**Person ID** 1263717

**Full Name** Helen Wells

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

Whilst appreciating the need for extra housing in the borough, I question the sheer number of dwellings that are planned. In view of the changes to employment caused by the Covid crisis, most forecasts predict that working from home will increase significantly, once the present outbreak is under control. In many respects, the Covid epidemic has only speeded up an existing trend. Additionally, the present Government has announced its intention to reinvigorate areas in the Midlands and North to increase industrial and business investment and employment opportunities in these areas.

I suggest that , taking into account the Government's policy of moving business out of the Home Counties and the fact that, in this age of electronic communications, distance to work ceases to be a governing factor, large numbers of people will wish to live in a much more reasonably priced area than Dacorum.

In light of these considerations, a reassessment of the Dacorum Local Plan is urgently required.

**TRING**

I am sure that inhabitants of other towns and villages in the borough are better qualified than I to speak about their local area, but as a resident of Tring, I wish to state my objections to the current plan and to offer some suggestions as to the manner in which I think it can be improved.

## **OBJECTIONS TO CURRENT PLAN**

### **Facilities**

- 1 A 55% increase in housing will alter the entire character of an historic market town. Why has the Council decided that Tring should bear the brunt of this development?
- 1 The town's infrastructure is not capable of sustaining such a large increase in population. I note that the plan does make provision for potential new schools, but many other services are required.
- 1 Car-parking for High Street shopping is at a premium and is one of the factors in the decline of facilities in the town centre. The Council are naïve if they believe that new residents will not use cars to access shopping and leisure facilities.
- 1 The proposed re-development of the Fire Station and Auction area will exacerbate the car-parking problems. Even Tesco's large car-park is sometimes totally full.
- 1 Most of the proposed housing is distant from the High Street. The surrounding roads are narrow and any further traffic will only add to the present congestion.

The Council are naïve if they believe that new residents will not use cars to access shopping and leisure facilities, especially as the eastern development is distant from the town centre.

- 1 There is a lack of local employment – most new residents are going to be commuters. It is obvious that the proposed employment facilities will be inadequate to cater for the vastly increased population.
- 1 Car-parking at the station is also limited; indeed the Station Car-Park's own web-site states that even season-ticket holders cannot be guaranteed a parking place after 8 a.m. Many people from surrounding villages use the station

and, owing to the car-parking charges, there is a growing tendency for commuters to park in the Grove residential area, thereby causing considerable inconvenience to residents.

### Environmental concerns

- 1 The proposed housing to the east of the town is on Green Belt land. The Chilterns are an area of Outstanding Natural Beauty and the sheer size of the development will have a serious detrimental effect on a beautiful environment, impacting on valuable farming land.

The Government, in addition to its policy of focusing housing in the Midlands and North, has announced that it would now be prioritising brownfield sites and urban areas - not Green Belt.

- 1 The Covid crisis has only emphasised the value of green spaces for exercise and leisure to improve mental health. The areas between the town and the canal, especially Marshcroft Lane, are in almost constant use by dog-walkers, cyclists and hikers.

### Included files

**Title** The Housing Strategy

**ID** EGS9043

**Person ID** 1267059

**Full Name** Fiona Fulford

### Organisation Details

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

### The Housing Delivery Strategy comment

- I accept that we need more houses in the Borough, particularly affordable housing together with the accompanying healthcare and education provision, which are already over-stretched locally. However the current plan proposes over 16,596 houses to be built in Dacorum by 2038 - these projected requirements are based on outdated 2014 ONS population data. If the more recent 2018 figures are used then the projected housing requirement is halved!

The current plan grabs the equivalent of 1214 football pitches of green belt, whereas revised housing figures would obviously significantly reduce the amount of green belt land that would be needed. Personally I believe that this could be further reduced by using more brownfield sites - I suspect that the current plan projections for office space are now too high and need revisiting with the significant trend towards home working/ hot desking post-pandemic.

**Included files**

**Title** The Housing Strategy

**ID** EGS9050

**Person ID** 1267060

**Full Name** HELEN EVANS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy 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** The Housing Strategy

**ID** EGS9053

**Person ID** 1267061

**Full Name** LAURA SPRINGATE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy 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** The Housing Strategy

**ID** EGS9056

**Person ID** 1267063

**Full Name** ANN CONROY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy 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** The Housing Strategy

<b>ID</b>	EGS9060
<b>Person ID</b>	1267065
<b>Full Name</b>	M BALAC
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy 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>Title</b>	The Housing Strategy
<b>ID</b>	EGS9067
<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>The Housing Delivery Strategy comment</b>	<p>2) The wrong homes, for the wrong people in the wrong place. The sites identified in the plan are excessively large, and should be broken up into smaller parcels. This would encourage developers to build homes demanded by the immediate, local population, rather than trying to attract affluent earners from London and elsewhere. Some offering of genuinely</p>

affordable homes (with affordability deriving from average income NOT average house price) to enable people from the borough to stay in the borough is required, and developers should not be constantly permitted to circumvent this obligation by cash contributions to the council.

**Included files**

**Title** The Housing Strategy

**ID** EGS9085

**Person ID** 1146072

**Full Name** Helen Cole

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

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 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 .

**Included files**

**Title** The Housing Strategy

**ID** EGS9094

**Person ID** 1267074

**Full Name** Joanne Howe

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9109
<b>Person ID</b>	1174481
<b>Full Name</b>	Mr & Mrs Ostle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Review of demonstrable number of homes required; The actual number and type of homes identified as being required in Dacorum requires complete reassessment in the light of Covid, Brexit and other fundamental changes that will dramatically impact on the way we live, our needs, and the future needs of our society. If a balance where a requirement for more starter homes is identified, then surely it makes sense to situate those where land prices mean that more reasonably priced housing can be supplied.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS9114
<b>Person ID</b>	1267080
<b>Full Name</b>	Louise Shenton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy 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). There is little sustainable about the construction nor preserving of our heritage about this plan.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9123
<b>Person ID</b>	399320
<b>Full Name</b>	Mr Simon Jackson
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Having reviewed your strategy for your Dacorum Growth Plan I feel I must voice my strong concerns over proposals to the UK Government to build up to 16,000 new homes in the Dacorum area. This in theory could add an additional population of 60,000 people into a relatively small and beautiful area. This represents a possible 40% growth in population!</p> <p>To get this development wrong would cost us all, residents and you as the local council guardians , and quality of life that we all value.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9130
<b>Person ID</b>	1267105
<b>Full Name</b>	Matthew Richardson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I am writing to express my dissatisfaction and concern over the plans for new housing in Dacorum for the next 18 years. Despite using 2018 figures for some of the presentation, the number of proposed houses is being based on ONS 2014 figures instead of the more recent 2018.</p> <p>It seems to vastly overestimate the need for housing within the borough, not to mention the fact that given the current pandemic, such decisions should be delayed until a clearer picture of what life will be like post CV-19. Other local boroughs have suspended the consultations until such a time, why not Dacorum?</p> <p>The proposals cannot be adequately advertised; and therefore, reviewed and participated in, while most of the local population is following lockdown protocols.</p>

The governments white paper strategy of 'levelling up' the north of England also has yet to come to fruition, and would likely have a significant effect on the housing needs of southern counties

In addition, there is seemingly a significant lack of proposal as to how these developments would be supported by local infrastructure. Within Berkhamsted the school system has had to be upended in order to accommodate the population of school age children (5/6 years prior). There are also concerns regarding waste water treatment, traffic and more.

Finally; using the recent local developments at Bearoc Park as an example, I do not believe that the developments that are being planned and built as of now, fulfil the need for which they are intended: Affordable and sustainable housing. The local average house price according to the document is £454,000, with an average earning of £34,000 pa. Bearoc park prices average at £500,000+, well over and above what a first-time buyer could realistically achieve.

Housing is needed, but overshooting targets in an unsustainable manner to the disadvantage of the green belt and existing residents, is simply not a viable alternative to properly planned and managed expansion.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS9141

**Person ID**

1267119

**Full Name**

Helen Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

firstly let me preface this with an understanding that houses are needed and have to be built somewhere and ultimately no one wants their surrounding area to change as ultimately they chose to live in that place because of how was at the time of purchase. Should the development go ahead, new potential purchasers will have the same considerations.

That said, with the current pandemic, it has given us all more time to reflect on where and how we live. Walking around Berkhamsted town centre, the 1970s shops were right for the time but I am sure they wouldn't be given planning permission now as they don't enhance the centre but were a functional solution. I believe the same of the proposed development... it is a functional solution but in the long-run won't be regarded by future generations as the best possible solution. Green belt is there for the good of nature and people - never before has it been more important for people to be able to access open spaces and places to walk. The arguments with regard to access, infrastructure etc. are well documented so I

don't need to refer to them... I just believe there needs to be some 'blue sky thinking' with regard to this. Go bold, develop new towns rather than overdevelop existing ones. I have children who will need flats/houses but a new town with its own infrastructure is the right place for them and many others... we can't keep on adding to the existing as it will reach an unsustainable point. We need to think bigger and wider and not wreck what we already have and won't be able to get back.

Please listen to the locals and think of more radical solutions rather than wrecking something that deserves to be preserved.

**Included files****Title** The Housing Strategy**ID** EGS9150**Person ID** 211352**Full Name** Mr Andrew Sanderson**Organisation Details****Agent ID****Agent Name****Agent Organisation****Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

DBC have accepted a huge housing target (unjustifiably) but having done so it has just looked at the map for places to put them. The impact on

Tring in particular is enormous. DBC underestimates windfalls ignoring even Government estimates of the effect of the pandemic. Realistic assessment of the windfalls (as shown by BRAG) vastly reduces the need for encroachment into the Green Belt.

DBC should release all of the land in HH01 and HH02 now in alignment with the Core Strategy 2013.

Why should this be deferred until 2023? What is the reason?

**Included files****Title** The Housing Strategy

<b>ID</b>	EGS9188
<b>Person ID</b>	1267172
<b>Full Name</b>	Ms Jennifer Hackett
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I wish to comment on the plan mentioned above, the Dacorum Local Plan (2020-2038) . This indicates a huge amount of development in Berkhamsted and Northchurch. The population would be hugely increased and the towns totally changed. The amount of development mentioned would completely change the character of these areas. This alone is against the planning and development guidelines. Looking deeper, it seems that the plan is already out of date. It is based on the guidance rules of 2014 with no adjustment for Green Belt and AONB implications. These changes reduce the number of dwellings to be built. The guidance was revised in 2018, and using these up-to-date guidelines produces a much smaller number of houses – about half of that proposed. Allowance must be made for these alterations to the guidance rules.</p> <p>In my view this lack of attention to the updated guidelines mean that the current plan should be rejected and re-formulated using the new guidelines.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9193
<b>Person ID</b>	1267190
<b>Full Name</b>	Ms Susanna Bennett
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

<p>* <b>Yes</b></p> <p>* <b>No</b></p>	
<p><b>The Housing Delivery Strategy comment</b></p>	<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>
<p><b>Included files</b></p>	
<p><b>Title</b></p>	<p>The Housing Strategy</p>
<p><b>ID</b></p>	<p>EGS9194</p>

<b>Person ID</b>	1267193
<b>Full Name</b>	Ms Keith Vanessa Gill & 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>The Housing Delivery Strategy comment</b>	<p>I'd like to oppose these developments completely,</p> <p>Firstly, the way the proposal was sent out at a time when the lockdown kicked in, and all hell was breaking loose stinks of a hidden agenda, the web site for information seems designed to misinform, and its being marketed as a boost to Berkhamsted's sporting? It's full of distraction, smoke and mirrors!</p> <p>It's clearly a commercial land grab without the consideration and environment impact assessments, trying to trick the local communities into thinking its benefitting them.</p> <p>Secondly, Berkhamsted's infrastructure can't handle an increase, never mind the substantial increase that's already from the Swing Gate Lane developments, the traffic along that route has increased significantly with no improvements, potholes are increasing exponentially along the route between there and the high street, and nothing has been done (what a surprise) so now we get into the high street itself, pre-lockdown the high street traffic was truly awful, with major tailbacks stretching in all directions, with a significant pollution impact to the surrounding area during these times, then there's the parking, yes we've got a new multi-storey, but the fact of life is people will seek out free parking around the high street, I used to live on Manor street and it's already a nightmare to park down there, people from this new development will exasperate this.</p> <p>Simply put, It just won't fit.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9197

<b>Person ID</b>	1267194
<b>Full Name</b>	Ms Miranda Heck
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I am writing to respond to the proposed Dacorum Local Plan. I have lived in Northchurch for 20 years, married and brought up 2 children here, I am dismayed at the proposed building of hundreds of houses which will damage our way of life, our safety and the environment.</p> <p>Northchurch has its own distinct character, its own community, its own Parish council, its own history and its own countryside. Being referred to as West Berkhamsted in these proposals denies our individuality in an attempt to disregard the value of our “village” identity.</p> <p>It is undeniable that there is a national need for more affordable housing and of course we cannot all adopt a ‘not on my doorstep’ attitude. However we equally should not blindly accept proposed mass building and the destruction of our local green belt without serious consideration of the way the numbers are calculated and the selection of suitable sites. In the case of these proposed plans, it appears the numbers have been derived firstly by a now discarded inaccurate algorithm and more recently by irrelevant and outdated statistics from 2014, when I understand more recent 2018 data is available? There is at the very least a need for clarity and transparency in the matter.</p> <p>The potential use of alternative brown field sites must surely be fully considered before we irrevocably destroy our precious countryside. Disused buildings and land can be regenerated and in the age of Covid with businesses folding and more employees working from home the potential for repurposing buildings in the coming years is surely relevant?</p> <p>The impact of the increase in road traffic on our already dangerous local roads doesn’t bear thinking about. Traffic increasing on New Road, over the narrow canal bridge, past our village primary school is a frightening prospect. I witness on almost a daily basis the very real danger to small children of congestion in the High Street and New Road with speeding cars and narrow pavements when children make their way to school. The resulting increase in pollution and poor air quality should also not be overlooked.</p>

Darrs Lane is also narrow, with poor visibility and is another major cause for concern. Similarly Bell Lane could simply not cope with the massive increase in traffic flow.

In addition, the local infrastructure could not cope. The local shops in Northchurch, predominantly Tesco, with very limited provision already cause dangerous parking all around, especially along Darrs Lane where people park increasingly further away from Tesco essentially narrowing Darrs Lane to a single lane. If the proposed expansion of Tring also goes ahead this will be further exacerbated by increased traffic along the High Street and people “popping in” to Northchurch Tesco.

I have also become aware of the threat to our chalk stream the Bulbourne. The increased strain on our water supply would threaten our river. The flow is already depleted and when caused to run dry by additionally supporting the water supply, irreparable damage is caused to our plants and wildlife. It is heart breaking to think the delightful clear stream that runs through our school grounds, that our school children value and clear rubbish from to protect it, which has been a part of my children’s life is under threat. Chalk streams need to be protected for our children’s future.

The countryside which is a part of and surrounds Northchurch must be preserved. Our hedgerows, our fields, are home to an array of flora and fauna. We are a village nestled in a valley with lovely views of the countryside. At present the many dog walkers, myself included are able to walk from home. If we have a sprawl of housing eating up our green spaces more will be forced to drive out to neighbouring spots, again increasing traffic and pollution.

I urge you to reconsider the numbers and the proposed sites before our way of life and our countryside is irrevocably damaged.

**Included files**

**Title** The Housing Strategy

**ID** EGS9200

**Person ID** 494912

**Full Name** Mrs Anna French

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I am emailing you to express my objections to the proposed development outlined in Dacorum Borough Council's document: Emerging Strategy for Growth (2020 – 2038).</p> <p>As a resident of Berkhamsted, and part of the wider Dacorum communities, I request that DBC reconsider this plan. The plan will severely impact the green belt and the areas AONB status which are key to the areas feel and also Berkhamsted's market town history. The whole area will be affected adversely by these over developments.</p> <p>I would like to say that I fully support the BRAG objections, but I would like to make the additional points:</p> <ol style="list-style-type: none"> <li>1 The loss of essential green spaces is irrevocable and brown field sites which now have special planning status should be considered. The decline in the demand for high street retail and the reduction in the requirement for large out-of-town retail spaces over the last few years means there should be a rethink on how these spaces could be used for housing, instead of building on precious green belt areas. Once these areas are lost, the habitat can never be recaptured.</li> <li>2 The expansion planned in Berkhamsted along Shootersway will cause terrible congestion and greatly increase the traffic on residential streets (for example, Durrant's lane, Cross Oak Road, Bell Lane, Darr's Lane) that are completely unsuitable for heavy traffic flow. Despite the new traffic lights at the top of Kings Road and Shootersway, this junction (pre-pandemic) was already very congested at peak times and this is before the completion of the Bearroc park development.</li> <li>3 The current infrastructure (roads, schools, doctors, parking, water supply) cannot cope with this huge increase in population. Infrastructure in Berkhamsted is struggling already - for example, the water supply relies on chalk aquifers, these draw water away from the borough's three chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006.</li> </ol> <p>I hope that DBC will take note of the electorate that vote them in to power and listen to and address their concerns by significantly reducing the development plans, and preserving our precious green belt.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9224

<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
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS9232
<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 * No	Yes
<b>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9245
<b>Person ID</b>	1267266
<b>Full Name</b>	Mr Tony Dempsey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I would like to strongly record my objections to the above plan for the areas in and around Berkhamsted due to the following reasons.

The numbers are wrong. The formula used or algorithm was changed, and best is questionable. Proposal is to build far too many new homes.

The impact to Berkhamsted and surrounds is far too great and will have a detrimental impact to our quality of life, increased pollution, road noise, light pollution, and many other areas.

The area would be forced to endure a significant amount of road noise and its subsequent road safety concerns.

The loss of green belt land will have serious ecological implications for generations to come.

The requirement to build huge developments of new infrastructure will impact everything from local biodiversity to road pollutions to increased levels of cars in the area.

Please would you record my objections.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS9248

**Person ID**

1264411

**Full Name**

Claire Wilson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**The Housing Delivery Strategy 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** The Housing Strategy

**ID** EGS9253

**Person ID** 1267286

**Full Name** Ms Scott Cullen

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

<b>The Housing Delivery Strategy comment</b>	<p>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.</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.</li> <li>- 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>	The Housing Strategy
<b>ID</b>	EGS9279
<b>Person ID</b>	1267352
<b>Full Name</b>	Jude 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>The Housing Delivery Strategy comment</b>	I wish to object to the DBC local plan around Berkhamsted. I don't believe accurate up to date figures of future housing needs have been made, and I don't believe the amount of houses being proposed or the destruction to green belt is justified. There needs to be more review of the future impact and housing needs.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9285
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9300
<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>The Housing Delivery Strategy comment</b>	The housing strategy should reflect our vision given in question 1.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9318
<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>The Housing Delivery Strategy comment</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>

There should be full economic assessments of where people will work, including impacts on travel and public transport as well as a comprehensive local economic development plan for Dacorum as a whole. This should include appropriate liaison and joining up with other local authorities and a clear understanding of where housing and local development strategies are complementary. This should include neighbouring boroughs and also major employment/economic centres nearby such as London and Milton Keynes. This is particularly important given the proximity of Dacorum to these locations (and its distance/isolation from other parts of Hertfordshire including the main centres within Herts CC).

Lastly, any developments that are permitted to take place within such a revised plan, should prioritise affordable housing and homes with the highest environmental standards. Plans should demonstrate how they will contribute to national and local 'net zero' targets not just through building standards, but also through energy usage and reduced car use including for commuting, access to schools, local recreational facilities etc).

**Included files**

**Title** The Housing Strategy

**ID** EGS9325

**Person ID** 1259852

**Full Name** Imogen Wagstaff

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

In addition to my concerns that the proposed housing developments on green belt land around Berkhamsted and Tring will not be able to be supported by the infrastructure of these towns. There is not adequate water support for these new developments significantly, not to mention the increased volume of cars on the roads which are already stretched. I also understand that the numbers Dacorum council has based these plans on are taken from government figures drawn from out of date sources (the 2014 census) and that the data from the more recent 2018 census does not support the need for this volume of housing.

**Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9410
<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>The Housing Delivery Strategy comment</b>	(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9497
<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>The Housing Delivery Strategy comment</b>	The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. It also fails to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9499
<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	
<b>The Housing Delivery Strategy comment</b>	<p><b><u>HOWEVER THE WHOLE LOCAL PLAN IS BASED ON THE WRONG NUMBERS.</u></b></p> <p>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 (<b>NPPF</b>), 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 (<b>CPRE Herts</b>) 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, <a href="https://www.cpreherts.org.uk/planning/local-plan-responses/item/2645-dacorum-proposed-local-plan-has-unnecessarily-high-impact-on-the-green-belt">https://www.cpreherts.org.uk/planning/local-plan-responses/item/2645-dacorum-proposed-local-plan-has-unnecessarily-high-impact-on-the-green-belt</a>) – significantly fewer than the 922 dwellings per annum proposed in the draft Local Plan.)</p> <p>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."</p> <p>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 "<i>meeting housing need is never a reason to cause unacceptable harm</i>" to the Green Belt (Government</p>

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.

**Included files**

**Title** The Housing Strategy

**ID** EGS9526

**Person ID** 1267427

**Full Name** Megan Humphreys

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

Housing Strategy is a crucial section. It gives more detail of where homes are to be located. There are serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development in Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.

**Included files**

**Title** The Housing Strategy

**ID** EGS9536

**Person ID** 398872

**Full Name** Mrs Jane Barrett

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I write to inform you that I utterly disagree with the Local Plan and in particular with the housing numbers proposed.</p> <p>I consider that the housing numbers proposed are excessive and unrealistically high in the light of local needs and potential for employment. For example, recent major developments to the west of the town ... e.g. Bearroc Park .. are already impacting the infrastructure such as roads, schools and doctor surgeries. Greatly increased traffic on Shootersway is now at an unacceptably dangerous level for pedestrians and cyclists; equally air and noise pollution significantly impacts adversely on local residents.</p> <p>I also believe that whatever plan is eventually adopted must specify exactly the order in which land should be released for development to provide a coherent development programme facilitating the provision of local infrastructure such as schools, shops and transport links and of course essential social housing. Developers should not be permitted to acquire develop land across the town on an ad hoc basis.</p> <p>For this reason I believe that the Bulbourne Cross proposals represent a logical and acceptable way to provide for the possibility of building additional homes and infrastructure for the town and should be fully considered by the planning authority.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9543
<b>Person ID</b>	1267432
<b>Full Name</b>	David Fox
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

* No	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>I accept that we need more houses in the Borough, particularly affordable housing together with the accompanying healthcare and education provision, which are already over-stretched locally. However the current plan proposes over 16,596 houses to be built in Dacorum by 2038 - these projected requirements are based on outdated 2014 ONS population data. If the more recent 2018 figures are used then the projected housing requirement is halved! The current plan grabs the equivalent of 1214 football pitches of green belt, whereas revised housing figures would obviously significantly reduce the amount of green belt land that would be needed. Personally I believe that this could be further reduced by using more brownfield sites - I suspect that the current plan projections for office space are now too high and need revisiting with the significant trend towards home working/ hot desking post-pandemic.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9547
<b>Person ID</b>	1267433
<b>Full Name</b>	John McDonough
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I am writing to register my opposition to the current local plan and would like to register the following points:</p> <ol style="list-style-type: none"> <li>The numbers are wrong and surely you know that? The number of new houses is way too high compared to what it should be and what is suitable and sustainable.</li> <li>I am very concerned, from what I understand as to why you would purposefully use out of date data, to justify the number of proposed houses required. This is either incompetent, which means everything should be looked at again or disingenuous / dishonest, which means that the people who have compiled that need to be questioned as to their motives, competence and capabilities.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9570

<b>Person ID</b>	1267442
<b>Full Name</b>	Teresa Adams
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I do not want to see anymore 4&amp;5 bed executive homes being built on Greenbelt land.</p> <p>Berkhamsted and Northchurch need homes built for local residents not homes to encourage more people re locating to the area.</p> <p>And to line the pockets of greedy developers.</p> <p>We need more 1,2&amp;3 bed affordable properties for young residents starting out and for older one's to down size to..freeing up the larger houses that are plentiful in the town and surrounding villages.</p> <p>My [AGE REMOVED] Mother lives in [ADDRESS REMOVED] (supported housing).Her flat is on [ADDRESS REMOVED].</p> <p>New Rd is treacherous enough for the elderly to cross with out adding more car users to it. Along with the additional fumes from more traffic idling at the junction.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9573
<b>Person ID</b>	1264671
<b>Full Name</b>	Mr and Mrs Dan Harris
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

* No	
<b>The Housing Delivery Strategy comment</b>	<p>Following a review of the Dacorum development plan to 2038 and being residents in Tring, we're concerned with the proposed plans to increase housing by 55% in Tring. Particularly when it appears there's little provision to expanding / improving infrastructure that exists today. Our objections are as follows:</p> <ul style="list-style-type: none"> <li>• Doctors &amp; Hospitals: It's unclear as to the provision for these services with such a significant increase. I'm not sure Stoke Mandeville could cope as it stands today with the increase in housing across Aylesbury and Tring.</li> <li>• A41: Already very stretched at rush hour times. This road will see a significant increase in usage when you review the other plans in place across Dacorum and Aylesbury Vale. I understand there are plans to have thousands of homes at the top of the A41. There will need to be a change to this road.</li> <li>• Linked to the above Train station comments - it's not clear how the provision for additional road users is being considered along Station Road or Northfield Road (from Pitstone) as it stands today these roads are already very busy particularly during peak hours.</li> <li>• The High Street today is already very busy from a traffic perspective made even worse with large vehicles and buses. An additional 3000+ homes in Tring without a clear plan for the high street doesn't work.</li> <li>• Train station: the parking provision at the station is already stretched. Prior to COVID-19 it was usually difficult to find a car parking space after 8:30. People are then left to park their cars wherever they can find space sometimes at the danger to pedestrians and other road users. There will need to be extensive changes to the parking provision at the train station. This is not mentioned in the plan.</li> <li>• Infrastructure:</li> <li>• A large proportion of the housing is planned to be in the fields behind grove road. Whilst I'm aligned that it may be a good location for additional housing, the volume of proposed houses is significant. This is a cause for concern with regards to traffic, firstly on Station Road but also down Grove Road and surrounding areas</li> <li>• On initial review of the plans, not all are in keeping with a traditional market town - Any approved plans must remain in keeping with the current town.</li> </ul> <p>We are not opposed to additional housing however, the proposed increased housing as it stands today is extremely excessive considering the lack of additional infrastructure. It is also clear that Tring is proposed to take a disproportionate increase when compared to other local towns.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9579
<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>The Housing Delivery Strategy comment</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 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.</li> <li>• 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.</li> <li>• I don't think that one road access to a residential area is wise. I think two ways in and out is safer.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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!</li> <li>• 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?</li> <li>• 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'?</li> </ul>

- Will the new houses be 'green' in the sense of - they will all have solar panels and other sources of renewable energy? It is a green-belt area.
- I'm no wild-life expert...but this is not an urban area (such as an old factory in a city being replaced with residential) - this is countryside. Many animals will live there. I myself have seen king fishers, ducks, herons, foxes, badgers, and much more wildlife along that stretch of the canal. You are killing their homes. Not only in the long run, but in the short term - while all the horrible machines are there digging and making noise. What are you doing to protect the wildlife that lives here? Are you planning on keeping a minimum 10 meter wildlife 'belt' between the canal and any potential housing? If this 'belt' is grass - will you plant more trees and shrubs to encourage wildlife to return after the bombardment of a building sight?
- You must add a footpath from Lock Field into Ashridge. So people can walk directly from Lock Field into Ashridge without having to use the foot path on New Road - again, this is too thin and not safe compared with the speed of traffic.
- Everywhere in Berkhamsted and Northchurch there are parking issues. Please can you design the new residential area to cope with the amount of vehicles. For example, plan houses to have ample driveways and garages for residents and guests. And double yellow the surrounding roads to STOP people from parking on footpaths. This is not safe for children. Again, if making safe footpaths means building 40 houses rather than 60 - then do it. Make this estate so that bin lorries and fire engines can EASILY drive everywhere (whilst keeping their bin collectors safe!)
- What about social responsibility? Is this new estate designed for middle and upper-class people? Or is it for everyone? Even working class? Are you mixing social housing between the large detached houses?
- How are you planning to future-proof this estate? Are you planning footpaths to be wide enough for two wheel chairs to pass each other safely? This would also be a safer width of path in case there is another pandemic and people have to keep 2 meters away from each other. Are you adding cycle paths? I think if you are serious about the environment then you should include cycle paths EVERYWHERE - even on New Road and the High Street. Even if cycling does not prove to be popular - you are future-proofing this space for things such as hovercrafts or the food-delivery-robots that you see even today in Milton Keynes. Everywhere footpath in Berkhamsted FAILS for safety. Lets make this new estate safe.
- Repair local roads after development. As seen on the new estates up Durrants Lane - the amount of construction traffic (and its pollution) has ruined the roads. Will you repair and redevelop the roads after this estate has been built?
- All of these new houses (both in Berkhamsted, Northchurch, Tring etc) will create a LOT more traffic on the road. How do you plan to future develop the T-junction next to St Marys School between New Road and the High Street? There is no safe crossing for children over New Road AT ALL! And it is next to a school!!!
- You MUST develop the infrastructure. How will you develop the Tesco shop parade and parking to deal with greater numbers? How will you develop local doctors and dentists to deal with greater numbers? Which hospitals are due to take on these greater numbers of people and how are you contributing to their development too?

To summarize; I know that growth is inevitable. But you MUST do it WELL and RESPONSIBLY, for the future of our area, our children and our wildlife.

I'm more than happy to talk to someone or detail my thoughts further. I'm happy to provide photographs of cars parked on pathways everywhere, videos of cars nearly hitting myself and my children walking to school etc etc.

If you build this Lock Field estate then do it WELL. Be innovators, be planet-protectors, be an inspiration to other areas who seek to grow too.

**Included files**

**Title** The Housing Strategy

**ID** EGS9587

**Person ID** 1267452

**Full Name** Caroline Wallace

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I live and work in Dacorum and would like to respond to the local plan. I am unsure from the website how to register so here are my comments:

The scale of the house building proposals in Tring and Berkhamsted seem extremely large for small towns, putting excessive strain on the towns resources, doctors, schools, dentists, roads, and leisure facilities.

This plan was made pre:covid and does not take into account possible changes:

The town centre space now empty that could be turned into residential spaces in Hemel Hempstead town centre.

How people would now like to work from home, are these new developments designed for people to work from home or in offices or workspaces nearby. Creating workspaces will lessen the commuting to London on workdays.

There is no discussion of culture in the document, which would be an essential part of creating effective communities. I would reference Billy Connolly who talks about his family moving to 'better' housing from Glasgow town centre to the

outskirts of Glasgow. He said that crime, and mental wellbeing was worse due to the lack of cultural or community focused spaces or activities.

There is often a focus to new developments, football pitches and sports facilities but cultural spaces, are often forgotten. Can I refer you to developments in Folkstone and Milton Keynes, where arts facilities such as workshops, cinemas, art galleries and art in the public realm projects are included as part of new development from the initial stages. This seems to be glossed over in these plans.

Finally, I would like say that the pandemic has shown how green spaces such as Ashridge Forest and Ivinghoe Hills have been damaged by an increased footfall. There is an increase in housing in areas surrounding Dacorum such as Leighton Buzzard, Aylesbury and Dunstable these will also have an impact on Dacorum's green spaces. There needs to be high quality green space adjacent to developments that people will be happy to spend time in.

**Included files**

**Title** The Housing Strategy

**ID** EGS9618

**Person ID** 1151590

**Full Name** Lynda Clarke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

(7) Housing Strategy gives more detail of where homes are to be located but is flawed by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections (likely to be bigger following changed practices likely to result from Covid experience), thus failing to maximise growth in urban areas at the expense of Green Belt.

**Included files**

**Title** The Housing Strategy

<b>ID</b>	EGS9632
<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>The Housing Delivery Strategy comment</b>	(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9644
<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	Yes
<b>The Housing Delivery Strategy 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** The Housing Strategy

**ID** EGS9669

**Person ID** 1267468

**Full Name** Chris Berry

**Organisation Details** CPRE Hertfordshire

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

**Chapter 7** on Housing Strategy will need to be rewritten, to properly reflect national policy, and up to date information in order to reach a sound conclusion on how much housing should be provided for in the Plan. Paragraph 7.2 misinterprets key paragraph 11 of the NPPF on the basis for such decisions and crucially in the second bullet point, fails to state that the Plan's housing requirement is not the same thing as housing need, but has to be determined in the light of local circumstances. Furthermore the Council is not obliged to use the formulaic 'standard method' to determine housing need if there are exceptional circumstances applying in Dacorum, which CPRE Hertfordshire considers to be the case, but if that method is used, it should be based on the latest available projections independently published by the Office for National Statistics (ONS) which reveal a dramatic fall in projected households from the much older ones advocated by government.

In this respect, the 'evidence base' for the Plan set out in paragraphs 7.3 and 7.4 is woefully out of date on the capacity of urban areas, housing need, and how the Plan's housing requirement should be decided. Indeed, paragraph 7.4 treats need and requirement as the same thing, which they do not have to be, and clearly should not be, for Dacorum, because of the necessity to protect the Green Belt and designated landscapes, heritage and habitats, as well as the character of the Borough's towns, villages and countryside. That same basic error is repeated in paragraph 7.5. Surveys of need do not help understand the quantum of housing requirement. CPRE Hertfordshire does however welcome the statement that the Council will review the scale of housing need, and its proposals for the Plan's housing requirement.

As part of that review the Council is urged to reconsider its inadequate allowance for windfalls and the potential for regeneration (paragraphs 7.6 and 7.9) in the context of changes in demand for land and premises in retail, commercial, industrial and other employment uses following the Covid pandemic and Brexit, and to reconsider the figures in paragraph 7.7 and Table 2, which are strongly opposed.

As a result of the above changes needed to the Strategy, there are a number of changes needed to other parts of the Plan, for example to paragraph 7.21 about HGC and proposed expansion of Hemel into St Albans District, which are a matter for St Albans Council, not Dacorum, and the figures for proposed housing provision in Policy SP4 need to be significantly reduced.

**Included files**

**Title** The Housing Strategy

**ID** EGS9689

**Person ID** 1267471

**Full Name** Richard Evans

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

**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.

**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.

#### 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.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9690
<b>Person ID</b>	1267472
<b>Full Name</b>	Debbie Hawkins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	

**The Housing Delivery Strategy comment**

**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.

**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.

**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.

**Included files**

**Title** The Housing Strategy

**ID** EGS9699

<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>The Housing Delivery Strategy comment</b>	<p><b>The number of houses proposed in Dacorum</b></p> <p>House building forecast was based on an algorithm which has since been scrapped. However numbers have been altered by the Government to justify these out of date figures and instead of seeing a fall in houses being proposed, there has been a rise as everything is now based on out of date 2014 projections. The proposed number of 16,899 houses across the borough is far too high. It does not reflect projected population growth and will instead be detrimental to the whole of the area, in terms of increased congestion on roads, poorer air quality, hard surfaces leading to problems with surface water and environmental impact on our nature and wildlife.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9701
<b>Person ID</b>	1267476
<b>Full Name</b>	Sylvia Davidson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	To emphasise: the number of houses proposed is far too high; the estimate of need is 355 houses a year of which a high proportion should be social housing to serve the local need, not the profits of builders and developers.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9703
<b>Person ID</b>	1267479
<b>Full Name</b>	Roger Harrison
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I 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.</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. 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). There is little sustainable about the construction nor preserving of our heritage about this plan.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9705
<b>Person ID</b>	1267479

<b>Full Name</b>	Roger Harrison
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS9716
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS9726
<b>Person ID</b>	1267481
<b>Full Name</b>	Diana Holliday
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy 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 — 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.</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>	The Housing Strategy
<b>ID</b>	EGS9733
<b>Person ID</b>	1267483
<b>Full Name</b>	Paige Lester

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Emerging Strategy for Growth.</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> <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>	The Housing Strategy
<b>ID</b>	EGS9755
<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> * <b>Yes</b> * <b>No</b>	
<b>The Housing Delivery Strategy 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 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.</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>	The Housing Strategy
<b>ID</b>	EGS9769
<b>Person ID</b>	1267525
<b>Full Name</b>	Anil Mistry
<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>The Housing Delivery Strategy comment</b>	<p><b>1 Outdated housing requirements and impact on natural heritage</b></p> <p>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.</p> <p>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.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9774
<b>Person ID</b>	1267528
<b>Full Name</b>	Clare Williams
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Firstly, I would like to record my opposition to the proposed development at Bulbourne Cross. I am very concerned about the level of marketing they have been able to use and wonder how this is allowed as separate to the overall plan, if Dacorum borough council are not allowed to market in the same way then surely this is unfair competition.</p>

I also want to record my opposition to the scale of the proposed Local plan at Berkhamsted due to the fact that it includes building on green belt land and does not adequately address the issue of increased traffic and pollution in such a small town.

I would also like to request that more council housing is built and smaller more affordable housing rather than all the huge very expensive housing that seems to be evident in the current housing development off shooters way.

I am pleased to see proposals for new schools but we need more on accessibility into the town for all (bus routes and safe cycle paths).

I would also like to comment that the website for making comments online to the proposal was very difficult to navigate, I tried several times but had to come back to email.

**Included files**

**Title** The Housing Strategy

**ID** EGS9783

**Person ID** 1267530

**Full Name** Susan Lambiase

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy 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**

**Title** The Housing Strategy

**ID** EGS9807

**Person ID** 1263842

**Full Name** Karen Roberts

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

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.

It seems too that there is only a guarantee that as low as 10% of these homes will be built. How will the council fulfill it's obligation of 35 - 40%?

Headline numbers preposterous and unsustainable

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”.

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?

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?

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS9825
<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>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS9873
<b>Person ID</b>	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>The Housing Delivery Strategy comment</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** The Housing Strategy

**ID** EGS9885

**Person ID** 1267759

**Full Name** PETER AND TRACY DUDLEY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

We are writing to object to the plan for development in Dacorum for the following reasons:

The number of houses proposed for development per year until 2038 is based on figures produced in 2014, we understand that this proposes a figure of 1,023 houses being built in the area. These figures are now outdated and we're 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** The Housing Strategy

**ID** EGS9918

**Person ID** 1267774

**Full Name** AATMA SEESURRUN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.

**Included files**

**Title** The Housing Strategy

**ID** EGS9921

**Person ID** 1267776

**Full Name** Will Garbutt

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS9948
<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>The Housing Delivery Strategy 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. 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.</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>	The Housing Strategy
<b>ID</b>	EGS9953
<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>The Housing Delivery Strategy comment</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>	The Housing Strategy
<b>ID</b>	EGS9958

<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>The Housing Delivery Strategy comment</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> <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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

I am acutely conscious of the environmental impacts inherent in the proposed plans. In particular, the effect on the chalk streams within the area will be profound. The dry upper reaches of the river Ver upstream from St Albans should be a minatory lesson for all involved in this decision and I urge all officials and councillors involved to walk this route and subsequently justify to themselves and residents why this should be inflicted on the rivers Gade and Bulbourne.

**Included files**

**Title** The Housing Strategy

**ID** EGS9964

**Person ID** 1267791

**Full Name** RACHEL DAVIS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I'm writing to you in response to the local plan consultation. I have tried to respond through your portal but to no avail.

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.

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.

This leads me onto the brownfield sites that have been proposed. For me, it is only acceptable to develop on these if they will:

- enhance the local area aesthetically.
- use sustainable materials
- greenery and wildlife will be incorporated into the building and surrounding land design
- ENOUGH PARKING IS PROVIDED

I spend a lot of time walking around Hemel and looking at landuse and I can see that development on some of these brownfield sites could be beneficial to the town if they are managed correctly.

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 addtiion, 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.

**Included files**

**Title** The Housing Strategy

**ID** EGS9978

**Person ID** 1159323

**Full Name** Charlotte Grange

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

Overall, I'm largely against the volume of housing development proposed for Dacorum. Affordable housing will be needed in the future as the population grows, and a certain amount of green belt would need to be released for this, however, the volume of housing suggested here is far beyond what the current ONS population growth figures would actually require. I would also point towards the Government's housing need algorithm, which originally heavily placed the bulk of need on the South (5/7ths), and which is currently being revised to better redress the balance between the North and South. Until we have the new figures from the Government, it seems unwise to publish a local plan like this.

**Included files**

**Title** The Housing Strategy

<b>ID</b>	EGS9995
<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>The Housing Delivery Strategy comment</b>	The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. It also fails to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10009
<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>The Housing Delivery Strategy comment</b>	Housing Strategy The strategy is based on out of date estimates of dwellings needed and so is essentially flawed and seems to maximise growth by using a quick fix solution of grabbing greenfield Green Belt, ignoring urban development opportunities due to erroneous handling of windfall projections.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10048
<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>The Housing Delivery Strategy comment</b>	(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10062
<b>Person ID</b>	489014
<b>Full Name</b>	Mrs Carole Lewis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>The Housing Delivery Strategy comment</b>	<p>I must add that I grew up in post war Grimsby in very cramped housing- -until I was seven we were three families in a three bed roomed house --so I know how important it is to provide affordable homes and I am NOT a nimby.</p> <p>However, it seems that our current plan has some serious flaws, the first being the fact that the numbers in the target are based on dubious data. The local plan has been prepared to meet a government housing target of 922 houses per year. This target was calculated last year, using 2018 ONS projections, but applying a multiplier of 2.6 to this, thereby changing the target from 355 to 922. Similar multipliers were applied across the country, and as a result of pressure from MPs, this method for calculating housing targets was scrapped.</p> <p>However, in scrapping this method, the Government decided to go back to using 2014 ONS (well out of date) data, the outcome of which was to increase our housing target to 1023. The latest data suggests that the target should be 400-500 dwellings per year, but our target is currently around 1000 per year for 18 years!.</p> <p>I understand that there is limited room for any Council to resist this target, but it is definitely not impossible. We still live in a democracy! We need our council to stand up for us when the target set is clearly erroneous. I believe the outcome of this consultation will have serious consequences in the coming elections. The following further considerations also need to be taken very seriously.</p> <p>There are over 7000 people on Dacorum's housing waiting list. However, of the ~1000 homes proposed per year, only 75 per year will be social housing. Who are we building these houses for? How many will actually be suitable and affordable for local people?</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10066
<b>Person ID</b>	489014
<b>Full Name</b>	Mrs Carole Lewis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>We are currently looking at a potentially major change in how we live, work and shop. This consultation is based on life Pre COVID. Surely we should be thinking very seriously about what life will look like post COVID! So much will have changed. Some examples that spring immediately to mind are the likelihood of far less commuting, offices no longer needed in such large numbers and the resulting increase of brownfield land.</p> <p>I came to Boxmoor in 1965 to take up my first teaching post in Hemel Hempstead. Exciting times! Post war new town development agencies had searched for, found and built according to an inspirational vision. Post pandemic town planning needs to recover that visionary outlook to build for a better future. Please don't condemn our plan not to a vision but to a tired capitulation to a target set by a government facing huge national pressures, a government that through no fault of its own cannot possibly understand or care passionately for our own area as we and hopefully our elected council members do understand and care.</p> <p>I urge you, please, with all my heart and mind, to seize this last opportunity to take a fresh look, starting by standing up and absolutely insisting on our target being based on the right data. We will all be right behind you!</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10093
<b>Person ID</b>	1261831
<b>Full Name</b>	Ian Wells
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I am amazed that this proposal is still being considered, given the Government U turn on its future housing policy late last year, <b><u>this plan is obsolete</u></b> .

### Extract from Housing Today 20th Dec2020

“The government now plans to refocus housing numbers and affordable housing investment into major cities in the North and Midlands as it prepares to launch a revised planning formula for calculating housing need.

The change of course comes after a huge backlash from Conservative MPs regarding plans for the formula – dubbed a “mutant algorithm” – which would have focused housing in high value and rural areas in the South and South-east.

In a statement released in advance of the publication of the formula itself, 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.

In addition to publishing the revised formula, the government also announced that it was ditching the so-called 80/20 rule, whereby 80% of housing investment goes in to high-value areas in London and the South-east, creating a new role for Homes England to accelerate housing delivery in the capital, and setting up a new Urban Centre Recovery Taskforce.

Housing secretary Robert Jenrick said the plans will see the 20 largest cities in England encouraged to build more homes. He said the government would set up a £100m Brownfield Land Release fund to encourage new homes on previously used sites.

Jenrick said the government was reforming the planning system to make it simpler and more certain without compromising standards of design, quality and environmental protection. He added: “We want this to be an opportunity for a new trajectory for our major cities – one which helps to forge a new country beyond Covid - which is more beautiful, healthier, more prosperous, more neighbourly and where more people have the security and dignity of a home of their own.”

He also linked today’s announcement to plans unveiled at the start of the month for new permitted development rights allowing most high street and town centre uses to convert to housing without needing planning permission.”

Given the above I, as a party member, fail to see how a Conservative controlled council can persist with these outrageous proposals.

#### Included files

**Title** The Housing Strategy

**ID** EGS10097

**Person ID** 1268038

**Full Name** LIZ JAZAYERI

#### Organisation Details

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>The Housing Delivery Strategy 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>Title</b>	The Housing Strategy
<b>ID</b>	EGS10130
<b>Person ID</b>	1268060
<b>Full Name</b>	DEREK AND CATHERINE HARDING
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No	Yes
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>Dear councillors, I most strongly object to these proposals This is land grabbing on a monumental scale which is completely out of proportion for the area. Green belt land is not there for housing development, it is designated GREEN BELT, to stop urban" sprawl" and protect the character of our small community.</p> <p>The infrastructure in our town struggles to cope with demand at present, expansion on this scale would overwhelm the town.</p> <p>Hospital facilities for the area are centred in Watford and already at full capacity. This extreme development would place an unacceptable demand on hospital services.</p> <p>Therefore , If you truly represent the residents of Berkhamsted I ask you to reject these development proposals.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10151

<b>Person ID</b>	1201633
<b>Full Name</b>	Dr mary davis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I have been unable to submit my comments on the website. Whilst I acknowledge the need for more houses nationally, I oppose the proposed scale of development for Dacorum, which is disproportionate to other areas. Removal of green belt should only be considered under exceptional circumstances under current planning policies and the subjective decision to do so in this plan requires more explanation and justification. Also, the scale of development will require a significant increase in the provision of schools, child care and health and social care. thank you for taking my views into account.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10153
<b>Person ID</b>	1145402
<b>Full Name</b>	Mrs Margaret Stanier
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	It is important to plan for the housing needs of the current population of the borough. The amount of housing proposed far exceeds that.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10166
<b>Person ID</b>	1268076
<b>Full Name</b>	Paula Feighery
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy 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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10168
<b>Person ID</b>	1268078

<b>Full Name</b>	Corran & Mark 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>The Housing Delivery Strategy comment</b>	<p>Having read through the Dacorum Local Plan we have the following feedback and observations:</p> <ol style="list-style-type: none"> <li>1 We understand the need for more family homes and support regeneration of the area. Much of Hemel Hempstead in particular is tired and the road infrastructure is appalling, with long queues in all directions at peak hours, leading to the “magic roundabout” bottleneck. A plan which sympathetically provides high quality family housing, open spaces and better infrastructure is welcome.</li> <li>2 What is not welcome however is the destruction of 2,000 acres of greenbelt. Once this is built on it will never be reclaimed. Building on green belt should be the absolute LAST RESORT, when there are no other options available.</li> <li>3 Allowing Dacorum to sprawl, swallowing up pretty hamlets and villages in an area of outstanding natural beauty (AONB) should also be avoided. The proposed housing developments will have a significant and detrimental input on the natural environment.</li> <li>4 We consider the Local Plan has not explored the regeneration of brown field sites sufficiently, especially in light of how shopping and working practices have altered as a result of the coronavirus pandemic. The use of existing town centre sites needs to be explored more thoroughly.</li> <li>5 We consider the calculations behind this plan to be flawed and based on obsolete data. Why does Dacorum need 25% more homes? The Local Plan should be based on the ONS figures from 2018 NOT the out of date 2014 ONS figures which appear to have been used.</li> <li>6 As per point 1, the roads in and around Dacorum are already congested. It frequently takes 20+ minutes to do a 5 mile trip across the borough. Adding 25% more cars is going to make this situation worse. The proposed new link road doesn't actually appear to link to anything at all. All the feeder roads to the new link road from Tring and Berkhamsted are narrow and or single lane. This is going to result in worse traffic and queues, in effect exporting Hemel's traffic problems out to the surrounding villages which are not equipped to deal with more cars.</li> <li>7 The proposed area for the Hemel Garden Communities (HCG) housing is in the wrong place. The area doesn't have any existing transport infrastructure. The station, the M25, the A41 and the M1 are all to the south or south east. Therefore HCG residents in this area are going to have to travel through the centre of Hemel Hempstead to gain access to the key transport hubs. Apart from the aforementioned link road, which doesn't actually seem to link anything, there is no explanation in the Local Plan of what the transport plan is going to be. HCG should be</li> </ol>

re-located to the east of the borough and ideally a new M1 junction (8A?) should be built to keep pressure off Junction 8 which is already extremely busy.

- 8 The Local Plan omits any reference to a separate 400 house development already submitted under planning reference 21/00171/SCE. 21/00171/SCE seems to be trying to sneaked in under the radar separately, rather than being considered as part of an overall cohesive plan. With the 5,500 homes proposed in the Hemel Garden Communities under the Local Plan and the 400 under 21/00171/SCE, it is actually another 6000 new homes being proposed in the same small area north of Hemel Hempstead.
- 9 In summary we STRONGLY OPPOSE the Local Plan in its current form. It needs a major re-think on what the overall objective is. The fundamental question that needs to be answered is **why does Dacorum need 25% more houses/people/cars/pollution/water usage/crime?**

**Included files**

**Title** The Housing Strategy

**ID** EGS10179

**Person ID** 1268082

**Full Name** Novanne Clark

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

As a resident in Markyate I would like to implore the future development to be shelved.

It would ruin the feel of our village and community to put more housing here. It is a beautiful village that has beautiful countryside that would be lost if this development goes ahead. Haven't we lost enough green spaces already ?

Please, please, reconsider building more housing, it would not enhance the village but would mar the beauty of its beauty and community.

**Included files**

**Title** The Housing Strategy

**ID** EGS10205

**Person ID** 211450

<b>Full Name</b>	Mr John Glasser
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>As a Tring resident I believe that the Dacorum Local Plan should strongly be resisted. It is ill conceived and badly thought out especially as the criteria and assumptions upon which it is based have changed significantly in the last twelve months. John Maynard Keynes famously said "when the facts change, I change my mind. What do you do, sir?" I would put the same question to Dacorum Borough Council (DBC).</p> <p>Firstly, the Government has decided that major housing development should be switched from the South of England to the North of England.</p> <p>Secondly, Covid-19 and Brexit, according to the Office of National Statistics (ONS), have both already had a significant impact on the population growth of England. The former has caused the birth rate to drop and the latter has resulted in net emigration of approximately 1 million people. Clearly the overall requirement needs to be reassessed.</p> <p>Even if this was not the case the planned growth for Tring is grossly excessive. In the natural scheme of things some growth would be expected but certainly not on the scale indicated by the plan. The plan suggests growth of approximately 50% in the allocated period. This would change and diminish the very nature of the town as would some details of the infrastructure that have been recommended eg a supermarket in Brook Street and also closure of the Tring Town Museum.</p> <p>DBC currently has major problem maintaining the sustainability of the area eg lack of appropriate jobs has resulted in the need for seven food banks in the borough. The number of acute hospital beds available to the population is one of the worst in England, indeed worse than in some developing countries. There is nothing in the plan that suggests that DCB would do any better with the envisaged population growth. I could go on ad nauseum.</p> <p>Stop now and rethink the plan. Start with some down to top consultation. Ask the young what they want. Take note of what John Maynard Keynes said. If you do the residents of DBC, especially of Tring, will thank you.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10223
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10287
<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	Yes
<b>The Housing Delivery Strategy comment</b>	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.

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.

I wish to note some specific points, as noted below.

- 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.
- 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.
- 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).
- 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.
- 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 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** The Housing Strategy

**ID** EGS10290

**Person ID** 1268244

**Full Name** LINDSAY KELSEY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I strongly disagree with the Local Plan and the housing numbers proposed for 1700 more houses on Shootersway, Kingshill Way and the Chesham Road.

You need to look very carefully at the infrastructure, especially Shootersway which is already used as a rat run. The road was not designed to take the number of cars that currently use it and is in a terrible state. Your plan would involve many more cars and this is not acceptable to residents.

There is going to be very little green space left in this area and I would like Dacorum BC to rethink their Local Plan and, they should, consider residents who live here and take a pride in their properties and frontages when they do.

For every new property you propose building in this area equals 2-3 more cars. How can Shootersway, Kingshill Way and Chesham Road possibly cope with your proposal showing 830 new houses accessed via Shootersway.

A while ago because of the incompetence of builders erecting new properties in Kingshill Way, residents were without their utilities. The road was shut for a week while repairs were carried out. Locals could not easily access the town. More inconvenience. It seems Berkhamsted and Tring would be paying a very high price for your proposed Local Plan. Please reconsider.

**Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10328
<b>Person ID</b>	1144307
<b>Full Name</b>	Mr Chris 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>The Housing Delivery Strategy comment</b>	<p>1 <b>Base Formula for Housing Need:</b> I do NOT think the overarching vision, the vision for Dacorum's places and the strategic objectives are right for the Borough I maintain that the entire plan is flawed, in that it has been based on <b>out-of-date</b> projections for housing demand in the Borough. I understand that the Draft Plan has been based on a calculation method (algorithm) produced by the Office for National Statistics (ONS) as long ago as 2014, whereas the ONS has more recently produced an updated method (i.e. new algorithm) in 2018, which would result in a much lower assessment of projected housing need in the borough. The ONS projections based on 2018 data indicates the annual need for Dacorum is around 350 dwellings pa. , which is even lower that the currently Adopted Plan (Core Strategy 2013 –2036) that settled on 430 pa. So how can a figure of 922 dwelling per annum be justified?</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10349
<b>Person ID</b>	1268422
<b>Full Name</b>	CAROLYN PANKIW
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>With reference to the above consultation. I have not been able to get on to any of the links given to view the consultation, however, I would like to register my objections to the plans for approx. 3000 houses to be built between Long Marston, Wingrave and Cheddington. The plan is totally inappropriate for the whole area. There is limited access to the site as all roads come through three small villages and other infrastructure is non-existent. There is an ongoing problem with flooding in Long Marston, as well as many of the fields around here.</p> <p>I do not understand how plans can be made when the land is owned by several different private owners and it is definitely not a major infrastructure project!!!!!!</p> <p>I do not live in Hertfordshire but on the edge (in Buckinghamshire) of the proposed project. Why is it that the consultation has been given such a limited time when the vast majority of the local population were not even made aware of them, especially those in Buckinghamshire who would be severely impacted by the plans. You cannot view the plans in the local library – these have been shut for many months, and as stated previously the links given to view the plans are unattainable.</p> <p>I am in disbelief that an area such as this could even be considered for such large scale building,</p> <p>I look forward to receiving your comments although, being slightly sceptical, I would doubt that I will even get an acknowledgement.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10353
<b>Person ID</b>	1268423
<b>Full Name</b>	Miranda and Alan Cummins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Housing Delivery Strategy 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. 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.</p> <p>The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will 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.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10357
<b>Person ID</b>	1268427
<b>Full Name</b>	GRAHAM HAYNES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>The plan exceeds the total requirement laid down by central government.</p> <p>The Developer-led nature of these plans means that there are insufficient guarantees that issues of sustainability and infrastructure will be properly addressed.</p>

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** The Housing Strategy

**ID** EGS10389

**Person ID** 1264613

**Full Name** Susan Kane

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

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 increasing 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.

**Included files**

**Title** The Housing Strategy

**ID** EGS10398

**Person ID** 1268432

**Full Name** SARAH STUBBS

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10423
<b>Person ID</b>	1268438
<b>Full Name</b>	LINDA GUNARY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ol style="list-style-type: none"> <li>1 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</li> <li>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 <b>away from areas located in the Green Belt</b> (which should only be used in exceptional circumstances) and the Chilterns AONB and its setting.</li> </ol> <p>No no no !! Too much and too little infrastructure and too much green belt land lost to building expensive houses not affordable for most people. We are killing the planet and this will just speed it up, it's based on incorrect data and needs to be seriously reduced in its impact !</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10460
<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>The Housing Delivery Strategy comment</b>	<p>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.</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 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>	The Housing Strategy
<b>ID</b>	EGS10473
<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>The Housing Delivery Strategy comment</b>	<p><b>1 Incorrect Assumptions for Housing Provision</b></p> <p>The assumptions for the size of the provision are based upon an algorithm for calculating housing need which the government have said is no longer the correct means to calculate the housing needs for Dacorum. It should be significantly lower to reflect the actual need for housing in the area. The focus should be on affordable starter homes for younger people, not huge expensive properties.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10511
<b>Person ID</b>	1264641
<b>Full Name</b>	Chris Mack
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Secondly, whilst I recognise the need for more housing in the country, I have many objections to the proposals, the most significant of which are:</p> <ol style="list-style-type: none"> <li>1) The huge increase in the number of houses in the borough will negatively and permanently change its nature.</li> <li>2) The loss of 2000 acres of Green Belt is a travesty. Throughout the proposal documents your arguments focus on the need for environmental sustainability, the importance of biodiversity, and the creation of garden spaces. Yet the way you suggest achieving this is by concreting over huge swathes of Green Belt land. This is farcical.</li> </ol>

Your document rightly states the importance of Green Belt land and says the Council is only allowed to amend it in 'exceptional circumstances.' You give no proof as to why the circumstances now merit this desecration.

3) The proposals in North Hemel will cause significant traffic problems on narrow country lanes. The plan suggests that the local road network has sufficient capacity providing there is 'greater uptake in walking, cycling, and passenger transport.' The proposed developments are significant distances from transport hubs so walking and cycling are impractical. This will inevitably mean thousands more cars on the roads and by your own definition the road network will not have sufficient capacity.

**Included files**

**Title** The Housing Strategy

**ID** EGS10514

**Person ID** 334492

**Full Name** Mrs Sacha Hughes

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am a long-time resident of Northchurch and am writing to log my OBJECTION to the DBC Local Plan.

My reasons for objecting include:

Overuse of outdated growth strategies – the algorithm used to create the growth strategy is outdated and seems to have been adjusted in order to simply justify the numbers. The strategy behind this appears to be a land-grab aimed towards freeing up Green Belt land which will be lost forever. The most recent data is currently the 2018 based ONS projection. However, it appears that Dacorum Council has based its calculations on the outdated 2014 ONS data, which I believe will result in a significant overestimate of housing and thus an outdated and questionable local plan if based on this data.

**Included files**

**Title** The Housing Strategy

**ID** EGS10538

<b>Person ID</b>	1268671
<b>Full Name</b>	Mr Mike Jennings
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</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.</p> <p>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> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS10588
<b>Person ID</b>	1268723
<b>Full Name</b>	MARGARET HAWKINS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>We also strongly object to the loss of the green belt, and the environmental impacts set out below.</p> <p>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 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> <p>Overprovision of housing</p> <p>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.</p> <p>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.</p> <p>Underestimating potential brownfield regeneration opportunities</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</p>

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.

**Included files**

**Title** The Housing Strategy

**ID** EGS10622

**Person ID** 1268732

**Full Name** KATRINA BECKWITH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

I consider that as Development Management Policies for individual planning applications accord with the Framework and Planning Practice Guidance, there are no objections to raise in relation to them in the main. It is noted however that proposed policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, provides an opportunity for the delivery of housing supply within settlements unaccounted for within the housing needs assessments supporting the plan, as the council have not sufficiently evidenced the likelihood provision of housing that will be supplied by such a policy

**Included files**

**Title** The Housing Strategy

**ID** EGS10642

**Person ID** 1268737

**Full Name** CLIVE 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>The Housing Delivery Strategy comment</b>	<p>Housing Delivery</p> <p>What is the growing need? How are these numbers arrived at, are they accurate and up to date?</p> <p>Is the housing for people that need it and can they afford it? 40% affordable housing but affordable for who. I cannot see how this delivers housing for those in need. The homeless and those waiting on the housing lists will not be in a position to afford housing here. Even the 'affordable' housing will not help them.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10653
<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>The Housing Delivery Strategy comment</b>	<p>DEF has received representations from various groups, and is itself of the opinion, that the proposed loss of Green Belt is neither justified by housing demand or compatible with preserving biodiversity and reducing carbon emissions.</p> <p>This is a summary of DEF's analysis of the issue: <i>(Quotations in italics, our comments in plain text)</i></p>

Dacorum Environmental Forum views the Plan's proposals to remove substantial tracts of land from Dacorum's Green Belt with indignation and a sense of betrayal. In this they have the support of **the majority of responses to the Issues and Options Consultation (2017) relating to Green Belt Matters**, as is confirmed in the current Green Belt Topic Paper thus:

*"5.6. The Council had a successful engagement on the previous consultation and received a total of 22,708 responses from 2,376 individuals and organisations to the 46 questions contained in the Issues and Options consultation.*

*5.7. There was significant support from key stakeholders including statutory consultees, Town and Parish Councils, individuals, resident action groups and other organisations for protecting the Green Belt from development in response to Question 9."*

According to Appendix 6 of the Report of Responses to the Issues and Options Consultation **94.66 %** said **"No"** to Question 9, which was "Do you agree with the proposed approach to Green Belt and Major Developed Sites summarised above" in general because they opposed the loss of Green Belt.

This more recent support of the Green Belt served to confirm earlier rounds of consultation. For example, when options for the rates of house building were given in the consultation on the Core Strategy of DBC's Local Development Framework in November 2010 as Option 1 (no Green Belt land take): 370pa and Option 2: 430pa. the majority of respondees favoured the lower growth figure of Option 1.

The consequent Pre-Submission Core Strategy 2011 took this on board as expressed thus: (1.17) *".. maintain the openness of the areas of the Borough designated as Green Belt or Rural Area;"*

*(1.18) "Maintaining the countryside helps to prevent towns and villages from merging into one another and ensures that they retain their distinctive characters." (6.2 Strategic Objective 12) "To protect and enhance Dacorum's distinctive landscape character, open spaces, biological and geological diversity and historic environment."*

The long-standing commitment of successive Governments to protect the Green Belt is much appreciated and highly valued in Hemel Hempstead, Berkhamsted and Tring, towns that have already seen their populations increase many times over within the memory of many of their present inhabitants. The constant presence of Green Belt land around the towns as a visual and recreational asset, and the support it has received from successive Secretaries of State, has provided Hemel Hempstead and the other towns and villages of Dacorum with the security of knowing that their identities will remain protected and distinct, within a much loved, valued and rare type of countryside. The proposal to destroy this

protection, building outwards in many cases from what have been the town boundaries for over half a century, and the **impression being given in the Plan that it is both an obligation and a *fait accompli***, is a cause of much anxiety, resentment and sense of loss throughout the Borough.

The current Plan merely pays lip service to Green Belt protection, by quoting the National Planning Policy Framework:

**(19.5)** *"The NPPF establishes five key purposes of the Green Belt:*

- 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..... "*

Inconsistently with this, many of the sites proposed for de-Green-Belting in the Plan, particularly the larger ones, are contrary to most of these key purposes.

The Plan fails to acknowledge or justify its departure from the Borough's history of planning principles and decisions affecting Green Belt/Local Allocations, and should acknowledge the need for an explanation the differences between past and current judgments.

(From the Dacorum Borough Council Local Plan 1995): ***"The existing Green belt boundary is generally appropriate for the long term"***

(From the Deposit version of the Dacorum Borough Council Structure Plan 1996): that there should be ***"no room for urban sprawl and other development on the edge of towns which take up green fields but do nothing to improve the town"***

More recently, the 2013 Adopted Core Strategy had:

- *"Maintain the openness of the areas of the Borough designated as Green Belt or Rural Area;"*
- *"Maintaining the countryside helps to prevent towns and villages from merging into one another and ensures that they retain their distinctive "*

6.2 (Objective 12) *"To protect and enhance Dacorum's distinctive landscape character, open spaces, biological and geological diversity and historic environment."*

8.30 *"The Green Belt will be protected from inappropriate development in accordance with national policy and remain essentially open in character."* Policy CS5: Green Belt ***"The Council will apply national Green Belt policy to protect the openness and character of the Green Belt, local distinctiveness and the physical separation of settlements."***

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10656
<b>Person ID</b>	1268740
<b>Full Name</b>	SUSAN SOMMERVILLE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I would like to register my opposition to the planned development of so many new houses in Dacorum - mostly on green belt.</p> <p>Many of these planned houses appear to be around Hemel Hempstead - around Boxmoor which already has bottlenecks of traffic and next to Leverstock Green rather than St Albans because of 'technicality'.</p> <p>This is an already saturated area and we don't even have a hospital close to this area.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10660
<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	

<b>The Housing Delivery Strategy comment</b>	It is the North of England that needs an expansion policy for housing and employment not the South
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10670
<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>The Housing Delivery Strategy comment</b>	DCB have accepted a huge housing target (unjustifiably) but having done so it has just looked at the map for places to put them. The impact on Tring in particular is enormous. DCB underestimates windfalls ignoring even Government estimates of the effect of the pandemic. Realistic assessment of the windfalls (as shown by BRAG) vastly reduces the need for encroachment into the Green Belt. DCB should release all of the land in HH01 and HH02 now in alignment with the Core Strategy 2013. Why should this be deferred until 2023? What is the reason?
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10690
<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	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>The Housing Delivery Strategy is fundamentally flawed as the calculation has used an out of date and inflated housing target</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10719
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10733
<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>The Housing Delivery Strategy comment</b>	The housing strategy should reflect my vision given in question 1.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10754
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS10793
<b>Person ID</b>	1268763

<b>Full Name</b>	Mr Michael Hill
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10801
<b>Person ID</b>	1268767
<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>The Housing Delivery Strategy 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</p>

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”.

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?

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?

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10810
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing

target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.  
(8)

**Included files**

**Title** The Housing Strategy

**ID** EGS10831

**Person ID** 1268791

**Full Name** ELIZABETH FULLER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

- The Housing Delivery Strategy is fundamentally flawed as the calculation has used an out of date and inflated housing target

**Included files**

**Title** The Housing Strategy

**ID** EGS10863

**Person ID** 1152225

**Full Name** GILLIAN JOHANSSON

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10906
<b>Person ID</b>	333678
<b>Full Name</b>	Mr David 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>The Housing Delivery Strategy comment</b>	<p><b>Introduction: General Concern</b></p> <p>I thank DBC for their hard work developing and updating a very thorough Draft Plan. This revised Plan that updates the documents that made up the Policies set out in the Adopted Core Strategy of 2013. I disagree however, that the Draft Plan should automatically meet the directive on the 'target' number of dwellings determined by the Ministry of Housing Communities and Local Government. The projections by ONS do not support the proposed increase number of new houses. Adopting the proposals in the Draft Plan results in substantial incursions into the Green Belt, including sites on the edges of Berkhamsted. The impact of Covid 19, will mean that large numbers of shops and office premises are likely to change use to residential, this has not been considered.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS10934
<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>The Housing Delivery Strategy comment</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> <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.</p> <p>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.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10954
<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	
<b>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10974
<b>Person ID</b>	1268903
<b>Full Name</b>	ANGELA NODDER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy comment</b>	Encroachment on to greenfield sites will adversely effective environment permanently. It will also cause increased pollution, with houses being close to the major trunk road.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10976
<b>Person ID</b>	1268903
<b>Full Name</b>	ANGELA NODDER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Ideally all development on brownfield sites
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS10993
<b>Person ID</b>	1268904
<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>The Housing Delivery Strategy comment</b>	<p>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:</p> <p>* When the Government changed it's policy Dacorum should have changed it's Strategy, instead the housing quotas were bolted onto work already done.</p> <p>* 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.</p> <p>* Too many houses where there are too few local jobs.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11007
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11025
<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>The Housing Delivery Strategy comment</b>	<p>I write to reply to the consultation on the Dacorum Local Plan, 2020-2038. I wish to object to the development as currently proposed.</p> <p><b>Outdated assumptions</b></p> <p>In my business experience, a plan is only as good as the assumptions in which it is based. By using housing projections from 2014, rather than more recent ONS data from 2018, the amount of housing required in our area may be significantly overstated. I understand that Central Government has instructed you to use the 2014 projections, but I wonder if there is scope to resist this, on the basis that it may lead to over-development, including unnecessary erosion of Greenbelt land. We are also about to embark on a Census - might this not present an opportunity to await its publication and base your projections on the most up-to-date information available?</p> <p>I accept that the Dacorum area should take its fair share of new housing. However, I am concerned that the current plan is based on outdated assumptions.</p> <p>I invite the Council to revisit its projections based on more current information.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11057

<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>The Housing Delivery Strategy comment</b>	Further consideration of unused brownfield sites and disused offices/factories. With the move towards greater working from home evidenced over the past year, this should free up office spaces/blocks already build which could be sympathetically converted into housing if needed. Essentially, use what we have rather than building new on greenbelt.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11061
<b>Person ID</b>	1268913
<b>Full Name</b>	SONIA FAIRBARN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</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.</p>

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.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11092
<b>Person ID</b>	1258923
<b>Full Name</b>	Arthur 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>The Housing Delivery Strategy comment</b>	The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.

It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.

**Included files**

**Title** The Housing Strategy

**ID** EGS11105

**Person ID** 1268937

**Full Name** Mrs Lynette Hyde

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

**Question 4**

**Specific comment on Delivery Strategies**

The number of houses to be delivered must be reduced.

We do not need/cannot cope with the potential increase of: 17,000 houses; 34,000 adults; 34,000 children; 34,000 cars!

**Included files**

**Title** The Housing Strategy

**ID** EGS11131

**Person ID** 211222

**Full Name** Mr Adrian Howe

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The level of housing development appears to be based on an out of date national target. The most recent figures from the ONS indicate that a far lower level of housing provision is required to maintain sustainability particularly with regard to the Green Belt and Chilterns AONB. We are regularly told that the government are anxious to develop other regions outside the south east, this level of development is completely at odds to that aspiration.</p> <p>The level of development can only have a detrimental affect on the Chilterns AONB which will be further squeezed into tiny pockets amongst the urban sprawl in Dacorum. The Hemel, Berkhamsted and Tring corridor effectively forming a solid knife into the heart of Dacorum's Chilterns. The current strategy must be scrapped or radically changed before it destroys Dacorum as a pleasant place to live.</p> <p>There are surely more brownfield sites available within the towns that with a reduction in the total level of development can help to protect our precious open spaces.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11135
<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>The Housing Delivery Strategy comment</b>	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.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11189
<b>Person ID</b>	1268980
<b>Full Name</b>	Ian and Pamela Gamble
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The apparent housing number of 16,899 up to the year 2038 is totally over blown. The council should be using the more recent ONS data from 2018 for figures on which to make projections.</p> <p>The whole character of Berkhamsted will be further ruined especially the entire South Berkhamsted section of the town. The increase in the size of Tring is absolutely horrendous and will destroy the town.</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11197
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy 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>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11224
<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>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the "windfall" calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11227
<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	No
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11233
<b>Person ID</b>	1263717
<b>Full Name</b>	Helen Wells
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Whilst appreciating the need for extra housing in the borough, I question the sheer number of dwellings that are planned. In view of the changes to employment caused by the Covid crisis, most forecasts predict that working from home will increase significantly, once the present outbreak is under control. In many respects, the Covid epidemic has only speeded up an existing trend. Additionally, the present Government has announced its intention to reinvigorate areas in the Midlands and North to increase industrial and business investment and employment opportunities in these areas.</p> <p>I suggest that , taking into account the Government’s policy of moving business out of the Home Counties and the fact that, in this age of electronic communications, distance to work ceases to be a governing factor, large numbers of people will wish to live in a much more reasonably priced area than Dacorum.</p> <p>In light of these considerations, a reassessment of the Dacorum Local Plan is urgently required.</p> <p><b>TRING</b></p> <p>I am sure that inhabitants of other towns and villages in the borough are better qualified than I to speak about their local area, but as a resident of Tring, I wish to state my objections to the current plan and to offer some suggestions as to the manner in which I think it can be improved.</p> <p><b>OBJECTIONS TO CURRENT PLAN</b></p>

## Facilities

- 1 A 55% increase in housing will alter the entire character of an historic market town. Why has the Council decided that Tring should bear the brunt of this development?
- 1 The town's infrastructure is not capable of sustaining such a large increase in population. I note that the plan does make provision for potential new schools, but many other services are required.
- 1 Car-parking for High Street shopping is at a premium and is one of the factors in the decline of facilities in the town centre. The Council are naïve if they believe that new residents will not use cars to access shopping and leisure facilities.
- 1 The proposed re-development of the Fire Station and Auction area will exacerbate the car-parking problems. Even Tesco's large car-park is sometimes totally full.
- 1 Most of the proposed housing is distant from the High Street. The surrounding roads are narrow and any further traffic will only add to the present congestion.

The Council are naïve if they believe that new residents will not use cars to access shopping and leisure facilities, especially as the eastern development is distant from the town centre.

- 1 There is a lack of local employment – most new residents are going to be commuters. It is obvious that the proposed employment facilities will be inadequate to cater for the vastly increased population.
- 1 Car-parking at the station is also limited; indeed the Station Car-Park's own web-site states that even season-ticket holders cannot be guaranteed a parking place after 8 a.m. Many people from surrounding villages use the station and, owing to the car-parking charges, there is a growing tendency for commuters to park in the Grove residential area, thereby causing considerable inconvenience to residents.

## Environmental concerns

1 The proposed housing to the east of the town is on Green Belt land. The Chilterns are an area of Outstanding Natural Beauty and the sheer size of the development will have a serious detrimental effect on a beautiful environment, impacting on valuable farming land.

The Government, in addition to its policy of focusing housing in the Midlands and North, has announced that it would now be prioritising brownfield sites and urban areas - not Green Belt.

1 The Covid crisis has only emphasised the value of green spaces for exercise and leisure to improve mental health. The areas between the town and the canal, especially Marshcroft Lane, are in almost constant use by dog-walkers, cyclists and hikers.

**Included files**

**Title** The Housing Strategy

**ID** EGS11234

**Person ID** 1262469

**Full Name** Mark Waters

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** I cannot believe there are sufficient "exceptional circumstances", which would allow building to the extent proposed in Tring, on Green Belt Land.

With regard to providing additional retail space in Tring town centre it should not be achieved at the expense of removing valued existing facilities such as the the Tring Historical Museum and Market Place, Dursley Farm and Auction House etc., which give character, choice and employment in the heart of the town.

**Included files**

**Title** The Housing Strategy

<b>ID</b>	EGS11247
<b>Person ID</b>	1268990
<b>Full Name</b>	Mr Nick 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	No
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11306
<b>Person ID</b>	1268999
<b>Full Name</b>	Mr Birkett Birkett
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I would like to add my opposition to the above proposed plans to develop housing in the local area and especially in the fields at the top of Swing Gate Lane and across the fields from Thomas Corum School to Bourne End in particular.</p> <p>Our town has been blighted by so many similar projects these past years and has continued to spoil and destroy our beautiful green belt area.</p>

I really can't see that another large housing development is needed here or in any of the other surrounding areas at this time, and they will certainly not be affordable homes that even local residents will be able to upgrade to, or be of any quality that others may want to downgrade to.

Furthermore, general exercise and keeping fit walks, especially during lockdown has made us appreciate where we live much more, and losing places like this will have a devastating effect on the environment, especially the space we need for our exercise and relaxation, our health in general, and even more so on the greenbelt wildlife flora and fauna.

More housing here will obviously bring more cars too, which will mean they will have to drive to town and bring extra traffic fumes and congestion to our already full and busy town.

Do we want greenery, trees, fascinating wildlife, clear open space and fresh air, or concrete, light pollution, fume pollution, noise pollution, more anti-social behaviour and crime....? I know which I prefer...!

I implore you to please consider this before making your decision and slowly destroy the town we love.

**Included files**

**Title** The Housing Strategy

**ID** EGS11344

**Person ID** 1269008

**Full Name** Mr Steven Kerry

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

*Policy SP4 – Delivering the Housing Strategy*

As per our comments to Policy SP2, the Plan only seeks to deliver 16,596 which falls significantly short of the new housing need figures published by the Government using the December 2020 methodology. This figure needs to be updated to at least 18,414 new homes in order to reflect the most up to date Government's housing targets.

As such, it is clear the Council will need to identify land to deliver a minimum of an additional 1,514 homes. In addition, the Council should ensure that there is sufficient flexibility in their supply to ensure needs are met, as recognised at paragraph 7.128 of the consultation document. To add some certainty that this is factored into the planned supply, we agree with the recommendation of the HBF that a 20% buffer in supply should be applied. The Council's assessment of

housing land supply indicates a 5.1 years supply upon adoption of the Plan in 2022. Given the higher housing requirement as dictated by the Government's new methodology, as currently planned for the Council will fail to demonstrate a 5 year supply of deliverable housing and upon adopted of the Plan.

The Plan does not allocate any sites for housing in the small villages and at the time of writing, with regards to the Rural Area, there is no intention by Tring Rural Parish Council to prepare a Neighbourhood Plan. As such, there is no certainty that development in these locations will be delivered as development is limited to windfall sites only. Given the additional housing need identified above and recommendation for a 20% buffer to be applied, it is clear that sites are required to be delivered immediately and the benefits of small and medium sized-sites are that they can be built quickly. These sites will provide a more immediate contribution to the housing land supply position and can assist the Council in maintain in excess of 5 years land supply during the early stages of the Plan period.

Villages such as Wilstone and Long Marston are among the least constrained settlements in the Borough. As such, they have the potential to accommodate some level of growth to help meet the housing requirement and, in line with Paragraph 78 of the NPPF, will maintain local services and facilities within these areas. We therefore consider that some sites in the smaller villages outside of the

Green Belt and AONB should be allocated for development in the emerging Plan which would reduce the extent of and reliance on sites released from the Green Belt and larger scale developments which have significant delivery times.

Point 'g states 'the development of small scale sites within the selected small villages.' It would be helpful here to define what is a 'small scale site' for clarity. In addition, point 'g' is contradictory to point 'f' of Policy SP2. Policy SP2 refers to small scale development whereas Policy SP4 refers to small scale sites. There should be consistency across the Plan to ensure there is no confusion regarding what is deemed acceptable in each location. Currently, the policies as worded confuse the expectations for development in smaller villages.

Notwithstanding our comments that further development should be directed towards the smaller villages located outside of the Green Belt and AONB, we suggest rather than limiting the site size the focus should be on extent of development as a site size restriction. Restricting the site size could potentially be detrimental to securing environmental benefits as part of development including large landscaped areas, SUDS ponds and basins and areas of open space. It also limits the ability to provide a 10% net gain in biodiversity on the site.

**Included files**

**Title** The Housing Strategy

**ID** EGS11355

**Person ID** 221830

**Full Name** Mrs Baerbel de la Bedoyere

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11369
<b>Person ID</b>	1269016
<b>Full Name</b>	Oliver Galliford
<b>Organisation Details</b>	Senior Planning Officer Hertsmere Borough Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Dacorum's Local Plan will make provision for a minimum of 16,596 homes. Whilst this is a significant increase on current housing requirements it falls short of the levels required under the government's revised standard methodology of 18,414 homes (1,023 per annum), a figure that was tested by the South West Herts Local Housing Needs Assessment</p> <p>Clarification is also required with regard to growth figures stated for each settlement and whether they include windfall development and homes delivered outside of the plan period; as there are inconsistencies between these figures and those stated within key policies e.g. SP2 and SP4. A summary table or map showing the proposed growth scenario in full would help to provide some context and clearly define extent of the proposed growth.</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11378
<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>The Housing Delivery Strategy comment</b>	Policy SP4 – The Housing Strategy: It is noted that the figure of 16,596 net additional homes is based upon the revised standard method which the Government consulted on in August 2020 and that the previously proposed changes to the standard method would have resulted in a local housing need calculation of 922 homes per year in Dacorum, rather than 1,023 homes per year. DBC will now be aware that the Government have since announced that the specific changes that were consulted on will not proceed and that subsequently DBC will need to plan for the higher local housing need figure of 1,023 per year. It is recognised that there are implications from this as further sites, or other necessary adjustments, may need to be included in the next stage of the Plan in order for DBC to meet its local housing need figure. TRDC would ask to be kept informed of any such changes as DBC progress.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11400
<b>Person ID</b>	1262227
<b>Full Name</b>	James White
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

- \* Yes
- \* No

**The Housing Delivery Strategy comment**

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". However, 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 is stated very clearly in a letter to the Housing Minister published on his website

(<https://www.gaganmohindra.org.uk/campaigns/july-2020-update-protecting-green-belt-whilst-building-new-homes>):

"As you may know, South West Hertfordshire is made up of 80% Green Belt land. In my election in December 2019, I vowed to protect the Green Belt to ensure that people who live in our area can continue to enjoy the vast, beautiful landscapes which draws so many families to settle in our communities. I am committed to ensuring that any review of the Green Belt, both at national and local level, stays true to the aims of the National Planning Policy Framework to reduce the risk of urban sprawl and the convalescence of separate communities...

I want to ensure that young families and children can afford to live in the area where they grew up, but that any developments fit the current character of our picturesque towns and villages."

In addition,as well as the irreversible and unnecessary damage to the Green Belt land being proposed in the Plan, there is also clearly a failure to provide adequate supportive infrastructure, another key principle within the Sustainable Development Strategy. Specifically, I look at the proposed developments on Green Belt land around Berkhamsted and state categorically that there is insufficient consideration in the Plan for the provision of new or of upgrading the current infrastructure to support the scale of the proposed developments. Berkhamsted is already a town which is at capacity in terms of schooling, road services, water supply and wastewater disposal. The valley location of Berkhamsted provides unique challenges to the provision of many services (water pressure, for example, is notoriously low at the top of the valley sides and flooding remains an issue along the valley floor). Adding another 8,000 or more people (based on 2,200 new homes) would only exacerbate these issues for which there are no easy solutions, particularly when the bulk of the proposed development would take place at the top of the valley sides, leading to much increased surface run-off into the town. In addition, whilst the provision of walking and cycling routes and local bus services is welcomed, the geographic realities of the town make walking and cycling much less attractive to all those but the most hardened of residents, which means that the majority of trips into the centre of Berkhamsted are made by car. Adding an additional 5,000 cars to the town would overwhelm the road and parking infrastructure, irrespective of the provision of the new multi-storey car park.

**Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11406
<b>Person ID</b>	1269022
<b>Full Name</b>	JENNI WHITE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>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". However, 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 is stated very clearly in a letter to the Housing Minister published on his website</p> <p>(<a href="https://www.gaganmohindra.org.uk/campaigns/july-2020-update-protecting-green-belt-whilst-building-new-homes">https://www.gaganmohindra.org.uk/campaigns/july-2020-update-protecting-green-belt-whilst-building-new-homes</a>):</p> <p>"As you may know, South West Hertfordshire is made up of 80% Green Belt land. In my election in December 2019, I vowed to protect the Green Belt to ensure that people who live in our area can continue to enjoy the vast, beautiful landscapes which draws so many families to settle in our communities. I am committed to ensuring that any review of the Green Belt, both at national and local level, stays true to the aims of the National Planning Policy Framework to reduce the risk of urban sprawl and the convalescence of separate communities...</p> <p>I want to ensure that young families and children can afford to live in the area where they grew up, but that any developments fit the current character of our picturesque towns and villages."</p> <p>In addition,as well as the irreversible and unnecessary damage to the Green Belt land being proposed in the Plan, there is also clearly a failure to provide adequate supportive infrastructure, another key principle within the Sustainable Development Strategy. Specifically, I look at the proposed developments on Green Belt land around Berkhamsted and state categorically that there is insufficient consideration in the Plan for the provision of new or of upgrading the current</p>

infrastructure to support the scale of the proposed developments. Berkhamsted is already a town which is at capacity in terms of schooling, road services, water supply and wastewater disposal. The valley location of Berkhamsted provides unique challenges to the provision of many services (water pressure, for example, is notoriously low at the top of the valley sides and flooding remains an issue along the valley floor). Adding another 8,000 or more people (based on 2,200 new homes) would only exacerbate these issues for which there are no easy solutions, particularly when the bulk of the proposed development would take place at the top of the valley sides, leading to much increased surface run-off into the town. In addition, whilst the provision of walking and cycling routes and local bus services is welcomed, the geographic realities of the town make walking and cycling much less attractive to all those but the most hardened of residents, which means that the majority of trips into the centre of Berkhamsted are made by car. Adding an additional 5,000 cars to the town would overwhelm the road and parking infrastructure, irrespective of the provision of the new multi-storey car park.

**Included files**

**Title** The Housing Strategy

**ID** EGS11437

**Person ID** 1264362

**Full Name** Juliet Miller

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

The housing strategy should reflect my vision given in question 1.

**Included files**

**Title** The Housing Strategy

**ID** EGS11461

**Person ID** 1261429

**Full Name** Douglas Fisher

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	Further sites are however needed for about 1800 additional homes if the new Government indicative housing needs figure for Dacorum is to be met.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11476
<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>The Housing Delivery Strategy comment</b>	<p>I profoundly object to this proposed plan on a number of issues - as summarised below:</p> <p><b>Housing numbers</b></p> <p>24% increase in housing is proposed in Berkhamsted (more than 900 houses.) The Council is using outdated (2014) housing projections. Half of this number is needed in reality (using more recent ONS data from 2018).</p> <p>DBC should challenge the proposed housing numbers – which are dictated by central Government, rather than just accept them.</p> <p><b>Housing distribution</b></p> <p>Hemel, Berkhamsted and Tring are all expected to take their ‘fair share’ of housing proposed. However, each of these settlements have their own issues and constraints. In particular, Berkhamsted’s topography, automatically restricts</p>

development to certain areas - at the top of the valley. Thus making people reliant on vehicles to enter town, adding to the congestion, and as described at the end, further affecting air quality. DBC just seems to be looking at the numbers, in terms of housing, rather than fully taking into account these constraints.

**Included files**

**Title** The Housing Strategy

**ID** EGS11484

**Person ID**

**Full Name**

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

The number of houses planned is wholly unsupportable – approx. 1000 per year. What plans, or intention of plans, are in hand to extend the necessary infrastructure for the current number of 350 per year – schools, water provision, medical, waste to name but a few. What consideration has been given to the land that will be taken? To sustain an increase in population, improvements in infrastructure need to be implemented as houses are built. The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in Berkhamsted. 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. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.

Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep up with the pace of development and ensure sustainability for existing and new residents and businesses.

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. What alternative to destruction of the greenbelt have been considered thus far? The plan should also guarantee that the greenbelt land only be released in phases, with a date contractually agreed with developers to begin work to allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices. Priority

must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings). There should be a programme to actively identify non-designated heritage assets during the period of the local plan.

**Included files**

**Title** The Housing Strategy

**ID** EGS11496

**Person ID** 865014

**Full Name** Mr Robert Turnbull

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**The Housing Delivery Strategy comment** Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.

Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.

**Included files**

**Title** The Housing Strategy

**ID** EGS11515

**Person ID** 1269117

**Full Name** ANITA PARRY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	No
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11526
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy 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.</p> <p>The Council has failed to take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>I also acknowledge that recent Government guidance on calculating housing need has been, at best, confusing. I strongly believe that housing needs should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. The Council has based its calculations on the outdated 2014 based ONS data which, in my opinion, would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11630
<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>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11669
<b>Person ID</b>	217693
<b>Full Name</b>	Mr John Goffey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

## The Housing Delivery Strategy comment

I have the following comments on the proposed Local Plan:-

Housing “Need”. The Local Plan calculates DBC’s housing need based using a nationally- mandated algorithm. The current MHCLG algorithm delivers a figure of 1023 dwellings per annum for Dacorum. My comments are based on this figure which is somewhat higher than that used in the Local Plan. I assume the discrepancy is due to the recent changes by MHCLG to the standard calculation method.

Application of the Standard Method of Calculation. I have analysed the results of the MHCLG algorithm as it applies to DBC and 49 other local authorities, including 19 authorities whose housing need has been uplifted by 35% by MHCLG. The other 30 authorities include six in Hertfordshire, the remainder are random. The results of my analysis are included in the attached Tables A, B and C.

Housing “need” calculated by MHCLG 2020 formula (Tables A & C). In absolute number of dwellings terms (1023), Dacorum is being required to build more dwellings than five of the “35% uplifted” authorities and nearly double the number required of Oxford, an authority with the same population and local plan proposal as Dacorum.

Dwellings p.a. per 1000 of local population (Table B). I have used the term “burden” for the number of new dwellings per head of population. Dacorum features the 10th highest burden out of 50 the local authorities, indeed higher than all but two of the “uplifted” authorities.

Dacorum’s housing “need” has been incremented by 137.9% from the previous plan; only six other authorities have had a larger increment imposed.

Negatively incremented 2020 Housing “Need”. While the MHCLG algorithm generally delivers an increment over the proposed number of dwellings p.a. in the Local Plans, in some cases it delivers a reduction. Negative increments ranging from minus 7.11% to minus 96.03% for 12 local authorities can be seen in red in Tables A and B. As the MHCLG algorithm was modified to deliver additional houses over the previous standard method, it appears that in some authorities it delivers fewer houses. This suggests the MHCLG algorithm is not fit for purpose.

Housing “Demand”. While the MHCLG calculation is intended to determine housing need based on projections of population growth and other factors made by the Office of National Statistics, it appears that the ONS data used by DBC in the proposed Local Plan is based on out of date ONS data. Indeed the current MHCLG calculation itself also uses out of date ONS data. Whether DBC have used the same data as the MHCLG recommendation is not clear (at least to me). I believe the local plan should be based on the latest available ONS data; only in that way can we understand the extent by which “burden” exceeds “need”.

However the column entitled “2020 Need % Increment over Local Plan” in Tables A and B suggest that in 76% of local authorities burden exceeds need by an apparently random margin varying between 2.21% at Milton Keynes and 246.67% at Three Rivers. While much of the discrepancy between authorities could be due to inadequacy of existing local plans, the existence of the negatively incremented authorities suggests again that the MHCLG algorithm is not fit for purpose.

Housing Target. It has been made clear by MHCLG that their approved calculation method produces a “requirement” figure for local discussion, emphatically not a “target” for dwellings per annum. The anomalies shown in the attached Tables A, B and C and discussed above suggest that 1023 d.p.a. for Dacorum is far larger than local need and should not be considered in any way a reasonable target. Furthermore the wide variations in burden across the country suggests

that the MHCLG formula simply delivers results with a heavy bias towards the south and east while showing that authorities in the north apparently are already proposing to build more houses than the MHCLG calculation shows that they need. This is an absurd situation that will deliver a a happy hunting ground for property developers in the south and east where they will build expensive houses on Home Counties green belt land while parts of the north are starved of infrastructure and housing investment.

DBC's 16899 new dwellings. When DBC's overall "burden" of 16899 houses is broken down between the constituent parts of the Dacorum area, an anomalous series of burdens appears as shown below:-

**Area**

**Population**

**(1000s)**

**Dwellings**

**(from Local Plan)**

**Dwellings p.a.**

**(over 18 years)**

**Dwellings p.a.**

**per 1000 population**

Tring Town

12.3

2731

152

12.4

Hemel Hempstead Town

102.9

10688

594

5.8

Berkhamsted Town

21.7

2236

124

5.7

Surrounding Areas

17.4

1244

69

4.0

Dacorum Borough total

154.3

16899

939

6.1

This table uses national census population data to calculate the number of dwellings per annum per 1000 head of population for Hemel Hempstead, Berkhamsted, Tring and DBC's Surrounding Areas. Tring is shown to be burdened with 12.4 d.p.a./1000, more than double that of Hemel Hempstead. This can hardly be considered compatible with the stated principle in the Local Plan that housing and employment expansion will be concentrated in Hemel

Hempstead with a small amount of expansion for Tring while for Berkhamsted some land currently used for employment is to be re-allocated to housing.

Summary The MHCLG standard method calculation appears to deliver so many anomalies it should only be used for the purpose for which it is intended, namely to produce a housing "requirement" figure to form the basis of discussion. There appears little, if any, discussion of the "requirement" in DBC's published Local Plan. On the contrary the the figure of 1023 dpa. (or 939 dpa, pro tem) appears to have been taken as a target. Up to date ONS data must be used; no explanation is given why out of date ONS data is being used at a time when birthrates have been falling steadily since 2012.

Expansion into green belt land should be avoided as far as possible; it is not clear how DBC could have done this when the housing "requirement" has not been discussed and settled. The NPPF makes it clear that it is not acceptable to simply use the MHCLG calculation as Government diktat and build on Green Belt land to meet a notional "target".

The social, environmental and economic burden of additional housing in Dacorum is not being distributed in an equitable way, affecting Tring disproportionately by comparison with the rest of Dacorum.

**Included files**

[John Goffey-Local Plan Comments TABLES A-C.pdf](#)

**Title**

The Housing Strategy

<b>ID</b>	EGS11676
<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>The Housing Delivery Strategy comment</b>	The housing strategy should reflect our vision given in question 1. 2. The second point to which I referred in my original response is that Dacorum should consider that the demand for affordable housing should include 15% of all housing be social housing for rent at a level that can be afforded by those on the AVERAGE INCOME in the UK.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11713
<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>The Housing Delivery Strategy comment</b>	Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.

Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.

**Included files**

**Title** The Housing Strategy

**ID** EGS11722

**Person ID** 1152494

**Full Name** MRS G RUSSELL

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

Re 7: Housing Strategy – see comments already made  
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.  
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.  
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.

**Included files**

**Title** The Housing Strategy

**ID** EGS11740

**Person ID** 1269230

**Full Name** CHARLES GABRIEL

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

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

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

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

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

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

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

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

**Included files**

**Title** The Housing Strategy

**ID** EGS11755

**Person ID** 1269233

**Full Name** CIARA KENT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.

Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.

**Included files**

**Title** The Housing Strategy

**ID** EGS11766

**Person ID** 1118045

**Full Name** Mr Pdraig Dowd

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

* Yes	
* No	
<b>The Housing Delivery Strategy comment</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>	The Housing Strategy
<b>ID</b>	EGS11776
<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
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan. Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11787
<b>Person ID</b>	1269238
<b>Full Name</b>	Dr Jill Timms
<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>The Housing Delivery Strategy comment</b>	<p>Yes. Written on behalf of myself and my husband (name removed) we register our objection to the local plan as it is proposed and have serious concerns about several key aspects.</p> <p>We are each also alligned with different local groups, where we know detailed objections have been put in. Therefore in this document we focus on a number of key areas of specific concern to our locale and where we can offer insight.</p> <p>1 Housing - we are deeply concerned over the proposed scale and type of developments planned here.</p> <p>a. We call for much more detail as to what is classed as affordable housing and plea for this to be affordable to locals and young people, with more protection for the future. For this to be the case, it will be necessary to include many more residents of flats at two or three stories due to the severe limitations of land value in this area.</p> <p>b. Housing opportunities should firstly take up every option of existing buildings, sites and brown field, and any additional space needed should only include very limited and efficient use of greenbelt land. At the moment the proposed developments go way beyond what the council are called to provide for this area and doing so in this way will completely change the character of the location and much of the beauty that means it includes so many AONB.</p> <p>c. Although it is noted that the scale of new properties will determine the level of new facilities, we remain concerned that this will not provide suffient infrastruture as this level of change will need re-planned core services and connections between then, rather than just keep adding more. In particular the size of Tring's High Street, parking spaces and space for predestrians needs much more consideration.</p> <p>d. We are deeply concerned about the climate crisis we all face, and although the emergency has been noted by the council and government at different levels, it is imperative that this urgently informs all plans and actions from this very moment. It is very hard to see evidence in the plan as it stands of how this proposal will make a reduction in emmissions and decarbonisation at the core of Dacorum's work and those it gives contracts too. I would argue that the whole plan should have this at its heart and as its main goal, as not addressing this will mean we do not have towns or villiages fit for habitation for future generations anyway.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11789
<b>Person ID</b>	1264468

<b>Full Name</b>	Melanie Parr
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy 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</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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11801
<b>Person ID</b>	1269238

<b>Full Name</b>	Dr Jill Timms
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>In summary, the current plan does not satisfy the needs of the borough, pushes for an overwhelming scale of development that is well beyond what is necessary from the policy, and which does not put the climate emergency at the centre of decision making. We are also concerned that to push through such a life-changing and future shaping plan at a time when people are struggling to cope with the everyday in this pandemic, will not provide a real opportunity for full consultation and on that grounds alone should see the proposal rejected for further investigation and consultation to take place.</p> <p>We look forward to your responses in this vitally important plan. Thank you.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11814
<b>Person ID</b>	398725
<b>Full Name</b>	Mr Valter 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>The Housing Delivery Strategy comment</b>	<b>5. 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</b>

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.

We hope that the following points will be taken into consideration when advancing the Dacorum Local Plan.

**Included files**

**Title** The Housing Strategy

**ID** EGS11816

**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  
\* Yes  
\* No

**The Housing Delivery Strategy comment**

Whilst CALA Homes supports the Council’s Housing Strategy, which is to deliver an average of 922 housing units over the Local Plan period from 2020 to 2038, it urges the Council to revise this figure at the Regulation 19 stage of the Plan to 1023 housing units per year to bring it in line with the Government’s Standard Housing Method announced in December 2020. This would result in a further 1,818 units over the plan period.

Despite CALA’s concern that the proposed housing target is not high enough, it recognises that it is a significant and essential increase in housing delivery numbers which is well above the 430 units per annum figure in the current Core Strategy.

It should go some way to address the historic under delivery in the past, as recognised by the Planning Inspector in his report on the Core Strategy in 2013. The Inspector noted the need for more housing sites and the lack of a comprehensive review of the Green Belt as well as recommending an early Local Plan Review to remedy this issue.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11843
<b>Person ID</b>	1269256
<b>Full Name</b>	JAIMI RAINSFORD
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I'm writing to oppose the size of the proposed plan. The draw and value both monetary and literal of this area is its beauty and green open spaces and to build up those areas is detrimental not only to wildlife and views but to the very value of this area.</p> <p>Why are you looking at 2014 ONS house estimates as opposed to 2018 estimates as your baseline it makes no sense. The houses aren't what is needed and are in the wrong place anyway. This will only strain the local communities of Tring and Berkhamsted. As a resident of Berkhamsted I am very concerned.</p> <p>The Chilterns is an AONB we cannot compromise this!</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11844
<b>Person ID</b>	1269257
<b>Full Name</b>	FRANKIE BIRCHAM
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS11868
<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> * <b>Yes</b> * <b>No</b>	
<b>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing

target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.

**Included files**

**Title** The Housing Strategy

**ID** EGS11887

**Person ID** 1269277

**Full Name** DEFINE PLANNING AND DESIGN LTD

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

Housing Supply and Delivery:

In its current form, the ESFG identifies just 16,899 dwellings in the plan period, which is significantly below the updated minimum housing need of 18,450 dwellings. In any event, BHL believe that DBC's supply of housing should be increased so as to **comfortably** exceed the value of 18,450 dwellings; to ensure that the Borough is able to meet its housing requirement whilst retaining a five year supply of housing land throughout the plan period.

However, even when considering the purported supply against the superseded minimum housing need of 16,596 dwellings, the ESFG fails to achieve this by allowing for a buffer of just 1.8% (303 dwellings). Such a small buffer provides the Borough with little room for slippage in meeting its minimum need. Indeed, whilst allocating a site is a considerable commitment towards its eventual development, some sites may not come forward for various reasons. That matter is particularly prevalent given the composition of Dacorum's land supply, which includes significant delivery at windfall sites, urban brownfield sites, and large sites.

Therefore, not only should DBC identify at least a further 1,551 dwellings to meet its updated minimum housing need, but it should also provide a buffer significantly above that figure to ensure that there is flexibility in the Borough's land supply, and to ensure that a "*sufficient amount and variety of land can come forward where it is needed*" to meet overall housing requirements (NPPF paragraph 59).

Windfall Sites

DBC suggests in Table 2 of the ESFG that 2,408 dwellings will be delivered via windfall sites, referring to DBC's 'Urban Capacity Study', which provides a windfall housing trajectory at Table 16. That trajectory indicates that a windfall allowance of between 100 and 200dpa is appropriate.

Whilst that position is informed by the analysis of historic windfall delivery trends and thus is largely robust, BHL note that a 200dpa rate is applied for the plan's final 8 years. Clearly, a 200dpa allowance is considerable (representing 20% of DBC's LHN) and appears to be an unreasonable position given the timing of that expected delivery. Indeed, whilst there has been significant windfall delivery in the Borough in recent years, the land available in the Borough for windfall development may well become increasingly depleted.

Therefore, whilst DBC are correct to identify a windfall allowance, the approach taken provides less certainty and reduces DBC's ability to direct development to appropriate locations and manage its timely delivery to meet the identified housing needs of the Borough. Therefore, an increased buffer in DBC's housing land supply that takes it well above the minimum housing need would be sensible.

#### Brownfield Sites

DBC's reliance on delivery from brownfield sites, with 31% of the supply identified in the ESFG coming from such sites, compounds BHL's concern on windfall sites. Whilst DBC's decision to support brownfield opportunities accords with the NPPF, brownfield development can often be particularly complex.

Indeed, brownfield sites can experience delays at various stages of the development process. Prior to an application's submission, existing tenants / landowners can delay or halt development aspirations, whether that is because of differing opinions on land value, or difficulties in relocating tenants. Furthermore, such sites are difficult to develop by their very nature, with the cost and difficulty of remediation a key constraint. Even if a site does not experience such issues, their build-out periods are often longer than those of greenfield sites. Indeed, Lichfields' *Start to Finish: What factors affect the build-out rates of large scale housing sites?* identifies that brownfield sites experience a longer period between receiving full planning permission and the delivery of dwellings, and also that the average build-out rates of greenfield sites are 34% higher than brownfield sites.

Whilst BHL understand DBC's allocation of brownfield land, the associated difficulties of delivering such sites do not provide sufficient certainty that development will commence in a timely manner. Thus, this would again indicate that a buffer above the minimum LHN would be sensible.

#### Large Sites

Whilst BHL supports the ESFG's identification of large sites, reflecting the NPPF's recognition that "*the supply of large numbers of new homes can often be best achieved through planning for larger scale development*" (paragraph 72), it notes that 56% of DBC's total supply will be delivered on sites of 200 dwellings or more. To achieve that delivery, BHL notes the importance of facilitating the timely delivery of infrastructure to allow large sites to be delivered within the plan period.

Despite that, the ESFG makes it clear that it "*does not seek to regulate sites and they are generally free to come forward providing necessary infrastructure can be delivered in a timely manner.*" The implicit suggestion within the ESFG is,

therefore, that the delivery from the large sites cannot be pinpointed, which may lead to a situation where there is not a continual and steady supply of housing.

With that in mind, more clarity is required in relation to DBC's approach to the delivery of strategic sites and the necessary infrastructure provision. In addition, this reflects that an additional buffer above the higher housing requirement would be sensible.

#### Applying a Buffer in DBC's housing land supply

In light of the above considerations, DBC should identify a housing supply that is above its minimum housing need of 18,450 dwellings to ensure that there is sufficient certainty in its land supply.

A March 2016 report by the Local Plans Expert Group recommends that an additional 20% uplift is incorporated into an authority's housing supply above its base requirement to allow for a flexible land supply. Whilst a 20% uplift would be considerable (totalling a supply of 22,140 dwellings), **a supply of 20,000 dwellings would be more sensible, and would provide a buffer of 8.5% above DBC's minimum LHN.** To achieve this, DBC must identify a further 3,100 dwellings above its current supply.

#### Accommodating additional development

Underpinning that is the clear acceptance within DBC's evidence base that an uplift in housing delivery to c. 20,000 dwellings could be accommodated with little additional adverse impact. Indeed, DBC's Sustainability Appraisal (SA) assesses the option of planning for 1,100dpa (19,800 dwellings) under Option E and, when the predicted outcomes are compared to those relating to DBC's preferred option (Option Ci - 922dpa), there is very little difference in the outcomes. Furthermore, the SA clearly states that the assessment of Option E does not take account of the chosen spatial strategy, and thus does not reflect that any additional adverse impacts could effectively be mitigated by directing growth to suitable sites in sustainable settlements.

Rather, the SA demonstrates that planning for a higher growth scenario (Option E) would result in clear benefits to housing provision, providing "*a number and range of homes to meet future needs of the Borough, particularly in relation to affordable housing.*" As such, identifying a housing supply of c. 20,000 dwellings would be more suitable, and would help to meet DBC's clear affordability issues whilst also providing certainty in its ability to meet its housing requirement.

#### Identifying additional development

To identify a supply of 20,000 houses, suitable development sites should be allocated in those settlements considered most sustainable and suitable for accommodating growth. Growth Area HH02 is currently proposed to be safeguarded for the future delivery of 4,000 dwellings; a clear recognition of the site's suitability for residential development. Thus, it would be sensible for that site to be allocated for the development **in this plan period** with an appropriate quantum of development.

BHL support the broad scope of the spatial strategy and distribution of growth, and welcome the focus of some 63% of dwellings to Hemel Hempstead and the central role the settlement is afforded in meeting the Borough's housing needs. Indeed, that reflects the merits of Hemel Hempstead as a sustainable settlement, which is underpinned by DBC's own evidence base.

Furthermore, BHL supports DBC's recognition of the need to release land in the Green Belt to meet its substantial housing need, which underpins the focus for growth "*in and around the sustainable settlements in the Borough, principally Hemel Hempstead, Berkhamsted and Tring through utilising urban land as well as through extensions to each settlement.*" In that light, BHL supports the allocation of Hemel Hempstead as the main strategic settlement, the focus of considerable development in the settlement, and the commitment made to the Garden Community programme.

#### Approach taken to Hemel Garden Community (HH01 and HH02)

Whilst BHL broadly agrees with DBC's approach to its spatial strategy, it contends that HH02 should be released for development during the upcoming plan period both to provide a buffer in DBC's land supply (as above) and to ensure that the Garden Community can come forward as a comprehensive development. The ESFG itself reflects this, stating that the scheme "*forms part of a large and comprehensive development that extends east of the town into St Albans City and District.*"

Indeed, the importance of supporting a comprehensive development that integrates both Phase 1, Phase 2, and the aspects of the wider development that fall into St Albans District, is outlined in more detail in BHL's response to Growth Areas HH01 and HH02 policy under Question 5 below.

However, by way of summary, the release of HH02 for development during the upcoming plan period and the pursuit of a comprehensive approach to the site's development is critical in ensuring that:

- 1 the necessary infrastructure can be delivered to support the development;
- 2 the practicalities of delivering the development are aided; and
- 3 the development delivers an efficient use of land and promotes good design

Indeed, Policy HH01 makes it clear that Phase 1 of the development requires the "*delivery of a strategic corridor route between Leighton Buzzard Road and Redbourn Road (via land in St Albans City and District Council).*" That is, development must occur in Phase 2 in order for Phase 1 itself to be accommodated. However, for developers to undertake the significant investment of delivering significant infrastructure such as this, they must be provided with a degree of certainty that Phase 2 will come forward, particularly given the financial investment required to deliver infrastructure.

The need for supporting infrastructure also highlight this requirement. Growth Area HH01 requires a 3ha primary school and 13ha secondary school, whilst HH02 appears to require two further 3ha primary schools, and a further 13ha secondary school. Both HH01 and HH02 require new district/local centres with a "medium or large supermarket." Whilst it is clearly critical that the required infrastructure is in place to meet new residents' needs, it would be more suitable to consider infrastructure provision at a more strategic-level between Phase 1 and 2. For example, it may be that a single large supermarket that is supplemented by small – medium sized supermarkets / shops would be more suitable and efficient; but the current phased approach does not allow for such considerations.

Similarly, the ability to produce a site-wide framework for transport and connectivity, drainage, landscape and visual mitigation, biodiversity and green infrastructure would promote a more efficient scheme with better design principles. Indeed, that sentiment is reflected by the plan itself, which states that the two phases "*should be planned together, as a minimum through closely aligned masterplans taking an integrated approach to the joint site area.*"

Thus, the development of the wider Hemel Garden Community would benefit from a more practical response to phasing through the allocation of Phase 2 for the delivery of housing and associated infrastructure during the plan period. This approach would also allow the Council to identify sufficient land to allow for a buffer above its minimum local housing need, to ensure that the Borough can maintain a robust land supply position throughout the plan period.

**Included files**

**Title** The Housing Strategy

**ID** EGS11903

**Person ID** 1269313

**Full Name** Mrs Rachel Martinek

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

**Unjustified choice of approach**

- 1 **Following on from an unsound premise (housing need) and unmoored vision, DBC then fail adequately to justify their own preferred choice of how to meet the alleged need, in part because it appears that securing infrastructure is the actual driver:**
  - Table 5-1 (SA p29) of the Interim Sustainability Appraisal shows that Option B scored more highly than the eventual choice of Option Ci;
  - The SA notes that Options A and B focus growth at the three main settlements, with no growth proposed for the larger villages in the borough; and also notes that DBC *“believes it is important that there are opportunities for growth to occur across the borough, including in the larger villages, which would assist in maintaining and enhancing the range of existing services and facilities, as well as potentially delivering new infrastructure, akin to Option Ci and Cii.”* This again suggests that the driver is not need, but a wish to secure infrastructure build (see para 11 above);
  - The above also misrepresents option B, which in section 5.3.2 is “Option B - Focus growth on Hemel Hempstead”.
- 1 **DBC also fail adequately to justify their own preferred choice of how to meet the alleged need, by appearing to discount the top-scoring option because it does not deliver the full 16,596 – which is not a statutory requirement – even though it would save Green Belt land:**

- The SA (5.5.2) notes that DBC rejects Option B because “*significant growth is already proposed for Hemel Hempstead through the emerging strategy, delivering almost two thirds of the overall housing requirement and safeguarding land for a further growth beyond the plan period.*” This, however, ignores that fact that if two thirds of the headline figure can be delivered without building on important Green Belt land, it is acceptable, even encouraged (see WMS 16 Dec) to stick at the two thirds delivery.
- DBC attempts to justify this by noting that all the options are around how to build the additional one third of the ‘requirement’: SA Para 5.3.2 NB states “*Common to all options are the circa 10,900 new homes inside settlement boundaries (the Urban Capacity sites). The options are therefore limited to how to distribute additional housing in the Green Belt, and not how to distribute all the proposed new housing.*” But again, this is a choice, not a statutory requirement (see paragraphs above on housing need).

**1 DBC also fail adequately to justify their own preferred choice of how to meet the alleged need, through a significant and unevicenced shift away from the 2017 Issues and Options proposal for Hemel Hempstead to provide the vast majority of supply, towards a focus on (Option Ci) “Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering Borough growth”:**

- In the 2017 Issues & Options consultation Hemel Hempstead provides the vast majority of supply and the remaining requirement was equally split between Tring, Berkhamsted, Bovingdon, Kings Langley and Markyate, signalled as appropriate so as to reduce impact on infrastructure. DBC have now identified that this approach is discounted due to the constraints on the infrastructure of Bovingdon, 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 – which is already stressed;
- 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 identity. This has not been explored;
- One of the reasons given for modest growth only in large villages is the lack of infrastructure. 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. Possibilities here have not been explored.

**Overall problems with preferred choice**

- 1 The entire approach leads to massively disproportionate growth in Tring (and Berkhamsted).** Tring’s proposed 55% growth is dramatically above the average growth of 25% for the Borough, which is already considered “ambitious” (p3). From Tring’s point of view, this has a disproportionate impact on residents and on the surrounding environment which has not been mitigated by DBC’s ‘paint by numbers’ approach to mitigation (see Tring-specific and site-specific comments, below).

-

- 1 **The entire approach fails to take into account the hub-spoke nature of Hemel Hempsted vs the traditional ‘ ribbon’ nature of Tring and Berkhamsted.** Growth in the latter therefore cannot be distributed equidistantly around the centre, and instead must be distributed, on either end, at ever increasing distances from the centre. This increases car dependency and also forces new settlements to intrude more heavily into the Green Belt.
- 1 **Emerging Strategy failure (15): given the inevitable significant impacts of choosing, with Tring, to add half a town to the existing town, DBC should have made this proposal a specific and standalone one.** This would have enabled Tring residents to have a proper, informed say on something that has such an impact. As it is, the Emerging Strategy presents it as an unavoidable part of an uncontroversial, albeit “ambitious” housing need. It is neither unavoidable nor uncontroversial.

**Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11921
<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> * Yes * No	Yes

**The Housing Delivery Strategy comment**

- 1 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 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.
- 1 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 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.

- 1 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 By contrast, using the standard methodology and the ONS 2018-based projections, the rate reduced to 536 dwellings per annum.

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.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11927
<b>Person ID</b>	1269347
<b>Full Name</b>	Rebecca Braybrooks
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>The Housing Delivery Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11934
<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>The Housing Delivery Strategy comment</b>	<p><u>Housing Allocation</u></p> <p>To quote your documents <i>Managing this Change 2.21 The planned levels of housing growth will signal significant changes to the towns and large villages over the lifetime of the Plan.</i></p> <p>The housing allocation is based on the outdated 2014 ONS figures, if the 2018 figures are used the allocation is significantly less, by up to 64%. Sticking to this lower figure all the required housing allocation could be fitted within a much smaller and more sensitively designed area around Hemel and in 'windfall' developments across the borough, some of which may result from the contraction of high street retail.</p> <p>The housing allocation is meant to take into account <u>local</u> needs but your own documents infer that the large housing allocation is to accommodate overspill from Watford, this is not a sustainable approach and rather than meeting local needs will exacerbate existing issues such as congestion and pollution.</p> <p>The housing allocation calculation is meant as a starting point before local priorities and designations are considered, almost all of the proposed housing is to be on Greenbelt land, land designated to protect the countryside from too much growth and ensure urban residents have access to greenspace, a green lung.</p> <p>The Greenbelt designation and the proximity of the Chilterns AONB should have been given more weighting with the Borough using the guidelines in the NPPF guidelines to argue a reduction in the housing allocation.</p>

Instead you state that 16,596 was calculated but the plan allows for 16,899 in case you cannot build it all. Would you stop building at the 16,596?

The St Albans proposals for housing joining to the Hemel proposals were thrown out as unsound, this suggests that the Hemel proposals also need re-examining as may be found equally unsound.

By using the wrong basis for the calculations and not taking enough account of local landscape designations and the needs of the resident local community the basis for the local plan as proposed is unsound.

Our Greenbelt provides a buffer between the existing and much valued Chilterns AONB and our urban areas, putting them in a proper visual context and protecting the AONB against the small acts of encroachment and fly tipping that degrade the AONB. Greenbelt needs to be protected.

The local plan must take into account all the local and regional needs and not merely prioritise economic growth through expansion of the urban footprint.

Not all the areas in the local plan designated for housing are known well to me, so I can only make specific comments on those shown below. But I strongly feel that both the basis of the housing allocation and the detail needs to be re-examined in favour of the local and regional natural environment and the true level and nature of local need.

**Included files**

**Title** The Housing Strategy

**ID** EGS11939

**Person ID** 1145687

**Full Name** Mrs Polly Walker

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

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.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11957
<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>The Housing Delivery Strategy comment</b>	7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. There is a serious concern about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS11977
<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>The Housing Delivery Strategy comment</b>	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12055
<b>Person ID</b>	1264202
<b>Full Name</b>	Philippa Wosiek
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The housing as suggested needs to be brought into line with the requirements going forward playing particular to the demands for increased social and affordable housing plus taking into account that the over 65 age group will increase by 60% over the next 20 years. Building large developments that have a greater percentage of larger more expansion houses is not what the community needs.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12056
<b>Person ID</b>	1264202
<b>Full Name</b>	Philippa Wosiek
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Dacorum should not be 'bullied' by Central Government but should be standing up and showing that they can give local residents what is needed and wanted. Local Government should be knowledgeable of what are Dacorum's actual needs not just pandering to a numbers game.</p> <p>The housing numbers as currently stated within the Plan are wrong. They need to be updated inline with not only the after effects of the coronavirus, but also to maintain all green areas putting in place improvements to same because they have become the very heart of our whole community. We need to preserve our environment, not 'trash' the green areas, ruin the biodiversity and continue to manage the countryside in such a way that all can use and benefit from it improving everyone's mental and physical health. This has been very clearly the case during this last year when our green spaces have provided much needed support.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12060
<b>Person ID</b>	1264202
<b>Full Name</b>	Philippa Wosiek
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>All windfall and brownfill sites should be developed first and foremost.</p> <p>We should NOT be taking Green Belt for any housing development needs - once it is gone we have lost the green environment that surrounds us within the area of Berkhamsted, Northchurch and the A41 with Hemel one direction spreading and Tring in the other. Is the intention to make the spread of housing or more correctly urban areas to become one as Hemel Hempstead, Berkhamsted and Tring developments eat up all the villages inbetween them? The A4251 will just not cope; all roads leading north and south into the A4251 will become even more congested - as residential roads with off street parking how is there going to be easy movement between homes and the town / village of Northchurch.</p>

It will become a total gridlock area - no emergency services will have easy access; no parent will be able to walk safely with their buggy holding the hand of a toddler and no older person will feel safe to walk.

**Included files**

**Title** The Housing Strategy

**ID** EGS12064

**Person ID** 1264202

**Full Name** Philippa Wosiek

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** I totally disagree with building proposals within the Local Plan in Berkhamsted, Northchurch and Tring areas.

**Included files**

**Title** The Housing Strategy

**ID** EGS12075

**Person ID** 1269372

**Full Name** MATTHEW SPEED

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the 'windfall' calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12078
<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>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12097
<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> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>I endorse the comments of the CCG &amp; the other organisations within the 'One Voice' Alliance which oppose the DBC Local Plan 2020-38 on the following grounds:-</p> <ol style="list-style-type: none"> <li>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.</li> <li>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</li> <li>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.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12118
<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>The Housing Delivery Strategy comment</b>	<p>Without commenting on the total number of houses to be built in Tring to 2038, we concur with DBC's view that Dunsley Farm site is suitable for considerable housing development, though the numbers could vary to the 400 as stated, depending upon the sizes of other developments and infrastructure schemes to be included in this mixed development. We are aware that this site is in Green Belt and in an ideal world, no Green Belt should be compromised, but we share the view with many that should the Government and DBC eventually decide that some Green Belt land surrounding Tring has to be compromised, this site is the least challenging one to the environment. Providing the site is developed sensitively, it could actually enhance the appearance of the gateway into Tring and could solve many of Tring's housing, environment and infrastructure problems. Comments on the proposed commercial development on this site are included in 8. The Employment Strategy below and comments on infrastructure, in particular sport and leisure land, can be found later in this document. We do believe, however, that HCC are trying to get a quart into a pint pot; the proposals that have obviously been negotiated between them &amp; DBC constitute over-development in our view, although the housing numbers proposed could be made to work.</p> <p>On the total housing numbers required for Dacorum, we offer a note of caution. Although DBC seemingly have accepted that the timetable for adopting The Plan will slip, (we estimate 2 years, as the Govt. are saying that it could be the end of this year before the Planning debate hits Parliament,) we feel that it would be unwise to move on to Regulation 19 before the substance of the eventual new planning laws are known or even that they are in place. The Government are unlikely to reduce the numbers once they have been sent for approval, although they might increase them!</p> <p><b>Policy SP4 – Delivering the Housing Strategy</b></p> <p>No objections, but caution. This policy may have to be amended as matters progress.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12129
<b>Person ID</b>	1165624
<b>Full Name</b>	Mr & Mrs Else
<b>Organisation Details</b>	Mr Richard Butler, Associate C/O Bidwells
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No  
\* Yes  
\* No

**The Housing Delivery Strategy comment**

Minimum Housing Need and Future Methodology Changes

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.

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.

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 & Windfall Development

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 additional sites being identified across the Borough for housing allocations in the Local Plan. This includes ensuring that sites that could come forward for housing through windfall development, such as my client's site at Edgeworth House, is not restricted by any unjustified designations such as the Open Land designation of Edgeworth House as discussed further above in this representation.

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, including those such as my client's site at Edgeworth House which can contribute towards windfall development, as opposed to large, strategic sites with long lead in times and significant infrastructure requirements.

Policy SP20 'Delivering Growth in Berkhamsted' of the Emerging Strategy for Growth identifies the delivery of at least 2,236 dwellings in Berkhamsted over the plan period, including 143 dwellings of known commitments and 1,876 dwellings of Local Plan Strategic Allocations. The estimated number of dwellings to be delivered from windfall sites is 217 dwellings for Berkhamsted.

We consider that the estimation of the number of dwellings to be delivered in Berkhamsted is unrealistic on the basis that the urban area is already physically constrained to achieve this target. Furthermore, unjustified designations that could prevent windfall development coming forward, such as the Open Land designation of Edgeworth House, would further hinder the Council from achieving its required windfall targets. Windfalls are a finite but diminishing resource so should not be ignored when they arise.

The Edgeworth House site without the Open Land classification could also assist the Council in other areas where it has targets to meet as well as its obligations in the NPPF. Housing development for older people will be encouraged in the NPPF on sites close to good public transport, local amenities, health services and town and district local centres. Few other sites in the area can satisfy all the above in the way that is achieved by the Edgeworth House site. The Edgeworth site offers almost endless limits in terms of its potential in future plans. The site could well be large enough to assist with the primary school requirements of the area or contributing towards the community health care requirements of the area as alternatives to its contribution to housing. With the identification of Green Belt land to meet the areas growth requirements, whilst this might be necessary, sites such as Edgeworth House should be considered and fully assessed by the Council as a site for housing as a priority and ahead of Green Belt sites being released for housing as this would be consistent with the requirements of the NPPF.

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12142
<b>Person ID</b>	1154438
<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	
<b>The Housing Delivery Strategy comment</b>	<p>Please take this email as a formal response to consultation on the Dacorum Local Plan, particularly in relation to the proposals for Berkhamsted.</p> <p>I object to the current plan for the following reasons.</p> <p><b>Housing number and distribution</b></p> <ul style="list-style-type: none"> <li>• The scale of the proposals will see an increase of housing in the region of 24%. Research shows that this is far in excess of what is required as it is based on outdated housing projections from 2014 and not more recent ONS data from 2018, which indicates only half of the 900 + houses are actually required.</li> <li>• Dacorum Borough Council (DBC), as a local elected body, should be challenging the housing numbers dictated by central Government on behalf of their communities, and not simply accepting figures that are not current or correct.</li> <li>• While I appreciate that 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, I don't believe that the draft plan takes these vital issues into account and instead simply looks at the numbers.</li> <li>• I do not believe that the current plan would provide what is really required, namely affordable housing. Recent developments in Berkhamsted have proved this.</li> </ul> <p><b>Infrastructure</b></p>

- The transport study takes *no* account of Berkhamsted's geography and valley Most building is proposed along the top of the valley.
- There are no significant proposals for improvements to roads or traffic flow. All additional traffic created will feed on to Shootersway, Kings Road to town/station, and various rat-runs to avoid inevitable congestion.
- No proposals have been made to improve walking/cycling/public transport routes.
- There are no significant improvements to public open spaces (apart from garden-sized suggestions only.)
- The proposed 'wildlife corridors' are simply a narrow strip along the A41, and don't connect with any meaningful habitats (no proposed tunnels for wildlife to go under A41 to access further green/habitat areas.)
- No additional health services – new surgery at Gossoms End is supposed to be able to cope with ALL the new developments. A minor extension of Manor Street is proposed. This is insufficient to meet the needs of the plan.

### **Water**

- DBC is relying on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. It's not clear what impact the development proposals will have on this, as well as sewage – especially with a greater number of housing suggested.

### **Greenbelt**

- Nearly all development proposed will be on Greenbelt. – this is *against* Government policy.
- The land between Shootersway and the A41 has always been considered as the "Green Lung" for Berkhamsted – absorbing vehicle emissions from the A41. Traffic has increased significantly in recent years. A green buffer is needed.
- The plan needs to look further at Brownfield sites, as I believe is a Government requirement.

### **Sustainability**

- The sustainability sections are weak at best. Berkhamsted is seen as 'sustainable' because it has (some) good facilities, despite the many constraints (hilly, congested main route through valley floor). Most of the proposed building is at the top of the hill, where people will rely on their cars for travel in and out of town. There are no significant improvements proposed for Berkhamsted's traffic situation, which is already an issue in the town.

### **Pollution**

- Air quality is borderline in many parts of town, verging on illegal at times. Northchurch has had additional monitoring for several years as air quality is so poor.

- Our town lies along a valley, with most residential areas along the bottom and up the sides. Air pollution naturally collects in this area.
- I would strongly argue that the proposed – excessive – developments, will result in poorer air quality.
- 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. This Local Plan, if anything, will make life worse for those already living here and offer a congested, polluted, market town, stretched beyond its limits, to anyone thinking of moving here.

#### Included files

#### Title

The Housing Strategy

#### ID

EGS12157

#### Person ID

1269444

#### Full Name

Mr & Ms Jim & Katie Barnard & Partridge

#### Organisation Details

#### Agent ID

#### Agent Name

#### Agent Organisation

#### Yes / No

\* Yes

\* No

#### The Housing Delivery Strategy comment

We wish to register our objection to the Dacorum Local Plan.

To be clear, we recognise the requirement at a national level to build a greater a number and variety of houses – particularly affordable carbon neutral houses – and the responsibility of all local authorities to subscribe to supporting this.

We object to the Dacorum proposals on a number of grounds, including;

- 1 Estimates of the volume of new houses required.
- 2 Locations for new housing (both at a total level for Berkhamsted & the proposed locations within Berkhamsted as well as the use of green belt and what we consider to be lack of due consideration of Brownfield / other alternatives)
- 3 The nature of housing likely proposed (ratio of affordable housing, carbon neutral house building methods).
- 4 The apparent lack of appropriate / careful consideration within the plans of all transport infrastructure impacts and the requirement for other local infrastructure (in particular schooling – primary and secondary)

- 5 The nature and timing of the consultation – in particular the lack of access for some cohorts (IT related access issues and Time related access issues, including on working families who are also struggling to home school at this time).
- 6 Lack of due consideration of the impact on the health and safety of local residents.

**Included files**

**Title** The Housing Strategy

**ID** EGS12177

**Person ID** 1269448

**Full Name** Mr John Mardell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment** How can it be guaranteed that all the development plans are implemented according to plan.

**Included files**

**Title** The Housing Strategy

**ID** EGS12184

**Person ID** 399285

**Full Name** Mr John Roberts

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

* No	
<b>The Housing Delivery Strategy comment</b>	<p>These housing numbers in the Local Plan for Dacorum and therefore Berkhamsted are excessive and totally wrong.</p> <p>The plan to "uplift densities of new homes" is ridiculous in an area of prestigious housing stock!!</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>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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12198
<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>The Housing Delivery Strategy comment</b>	<p>Policy DM2</p> <p>The last bullet point states "resisting the subdivision of sites to avoid on-site contributions." I strongly recommend this very weak, albeit well intentioned, statement be re-worded to reflect "the subdivision of sites to avoid on-site contributions is prohibited"</p> <p>Without being far stronger on this issue, there is serious risk of a big hole being blown in aspirations regarding provision of affordable homes. This point needs to be incorporated into policy DM2.</p> <p>Policy SP10</p>

I would like to see affordable homes being required to be orientated so that maximum effectiveness solar thermal (for hot water) and solar PV can be roof mounted – cost now very low. Many (most?) residents in affordable homes, especially social housing, are likely to be in fuel poverty. This step would save them in excess of £1,000 per year. For someone on minimum wage that is a huge amount.

**Included files**

**Title** The Housing Strategy

**ID** EGS12210

**Person ID** 1269470

**Full Name** PHILIP MOORE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

**Unjustified choice of approach**

- 1 **Following on from an unsound premise (housing need) and unmoored vision, DBC then fail adequately to justify their own preferred choice of how to meet the alleged need, in part because it appears that securing infrastructure is the actual driver:**
  - Table 5-1 (SA p29) of the Interim Sustainability Appraisal shows that Option B scored more highly than the eventual choice of Option Ci;
  - The SA notes that Options A and B focus growth at the three main settlements, with no growth proposed for the larger villages in the borough; and also notes that DBC “*believes it is important that there are opportunities for growth to occur across the borough, including in the larger villages, which would assist in maintaining and enhancing the range of existing services and facilities, as well as potentially delivering new infrastructure, akin to Option Ci and Cii.*” This again suggests that the driver is not need, but a wish to secure infrastructure build (see para 11 above);
  - The above also misrepresents option B, which in section 5.3.2 is “Option B - Focus growth on Hemel Hempstead”.

**1 DBC also fail adequately to justify their own preferred choice of how to meet the alleged need, by appearing to discount the top-scoring option because it does not deliver the full 16,596 – which is not a statutory requirement – even though it would save Green Belt land:**

- The SA (5.5.2) notes that DBC rejects Option B because “*significant growth is already proposed for Hemel Hempstead through the emerging strategy, delivering almost two thirds of the overall housing requirement and safeguarding land for a further growth beyond the plan period.*” This, however, ignores that fact that if two thirds of the headline figure can be delivered without building on important Green Belt land, it is acceptable, even encouraged (see WMS 16 Dec) to stick at the two thirds delivery.
- DBC attempts to justify this by noting that all the options are around how to build the additional one third of the ‘requirement’: SA Para 5.3.2 NB states “*Common to all options are the circa 10,900 new homes inside settlement boundaries (the Urban Capacity sites). The options are therefore limited to how to distribute additional housing in the Green Belt, and not how to distribute all the proposed new housing.*” But again, this is a choice, not a statutory requirement (see paragraphs above on housing need).

**1 DBC also fail adequately to justify their own preferred choice of how to meet the alleged need, through a significant and unevicenced shift away from the 2017 Issues and Options proposal for Hemel Hempstead to provide the vast majority of supply, towards a focus on (Option Ci) “*Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering Borough growth*”:**

- In the 2017 Issues & Options consultation Hemel Hempstead provides the vast majority of supply and the remaining requirement was equally split between Tring, Berkhamsted, Bovingdon, Kings Langley and Markyate, signalled as appropriate so as to reduce impact on infrastructure. DBC have now identified that this approach is discounted due to the constraints on the infrastructure of Bovingdon, 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 – which is already stressed;
- 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 identity. This has not been explored;
- One of the reasons given for modest growth only in large villages is the lack of infrastructure. 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. Possibilities here have not been explored.

**Overall problems with preferred choice**

- 1 The entire approach leads to massively disproportionate growth in Tring (and Berkhamsted).** Tring’s proposed 55% growth is dramatically above the average growth of 25% for the Borough, which is already considered “ambitious” (p3). From Tring’s point of view, this has a disproportionate impact on residents and on the surrounding

environment which has not been mitigated by DBC's 'paint by numbers' approach to mitigation (see Tring-specific and site-specific comments, below).

- 
- 1 **The entire approach fails to take into account the hub-spoke nature of Hemel Hempsted vs the traditional 'ribbon' nature of Tring and Berkhamsted.** Growth in the latter therefore cannot be distributed equidistantly around the centre, and instead must be distributed, on either end, at ever increasing distances from the centre. This increases car dependency and also forces new settlements to intrude more heavily into the Green Belt.
- 1 **Emerging Strategy failure (15): given the inevitable significant impacts of choosing, with Tring, to add half a town to the existing town, DBC should have made this proposal a specific and standalone one.** This would have enabled Tring residents to have a proper, informed say on something that has such an impact. As it is, the Emerging Strategy presents it as an unavoidable part of an uncontroversial, albeit "ambitious" housing need. It is neither unavoidable nor uncontroversial.

**Included files**

**Title** The Housing Strategy

**ID** EGS12230

**Person ID** 1269477

**Full Name** ELIZABETH ASHLEY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am 19 years old and have lived in Berkhamsted almost all of my life. I love my town so am extremely disappointed by the proposed development laid out in the draft local plan. Not only is it clear that the opinions of local people have not been taken into account, but it seems evident that there has been no thought of how the new developments will affect young people and the future of Berkhamsted.

Firstly, the destruction and development of large areas of greenbelt land is completely unacceptable. Not only will this have devastating impacts on biodiversity and local wildlife it also seems completely unnecessary. Where in the past the

council have said that greenbelt areas are highly sensitive to development and their boundaries “should be adjusted only in exceptional circumstances... with the support of local people.”

(letter from the Department of Communities and Local Government, June 2016) now that seems to have been forgotten in favour of property development companies rather than local people and the local environment. On top of this, building over greenbelt land will negatively affect the mental health of many Berkhamsted citizens. During the past year green spaces have become a much bigger part in everyone’s lives. I know for myself and my peers after the cancellations of exams we were left feeling useless, being so close to beautiful countryside was necessary in maintaining a sense of normality and sanity that we most definitely could not have gone without. In the current mental health crisis our country is facing, it feels irresponsible of the council to even think about removing so much green space from the local community. Instead, it seems obvious to build instead on brownfield land or through conversions of already urban areas – instead of taking away our beloved countryside!

I plan on living in Berkhamsted long into the future, that’s why I am so disappointed in the lack of affordable housing that the draft plan is proposing. Berkhamsted is known to be a bustling family town with people of all ages. Unaffordable housing will force out young people, changing the town’s dynamic and culture. I also worry about the affect that the increased population size will have on local infrastructure. My last year at Ashlyns school I saw first hand the strain on our local schools, although I see new schools have been proposed it does not seem enough.

The draft local plan is also incredibly vague when it comes to discussing how Dacorum council will work with developers and stakeholders to ensure that Hertfordshire’s carbon emission and climate targets are met. Local people should not have to suffer environmental degradation to their local town because of development that was unwanted in the first place!

Overall, as a young person who has grown up in Berkhamsted and plans to stay in the town long into the future I am extremely disappointed by the Draft Local plan, it lacks an awareness of the needs of local people and if it were to go ahead the environmental damage it would cause would be completely unforgivable. I hope my voice, and the opinions of other local people will be listened to and plans will be rewritten to meet the needs of the town and its citizens.

**Included files**

**Title** The Housing Strategy

**ID** EGS12235

**Person ID** 1269478

**Full Name** NIGEL TAYLOR

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>While I recognise the numbers are set out by central Government to meet the needs of developers. The idea that Dacorum can accommodate 922 houses per year is too much.</p> <p>When the Government was challenged about these number their response was to replace the algorithm. However, this resulted in a figure of 497. Their response was to use the earlier ONS figures as their base which gave a annual target of 1023 houses per year. This feels like setting the target then finding a formular that supports it.</p> <p>I believe the Local plan must be change as follows:-</p> <ol style="list-style-type: none"> <li>1 To reflect the climate emergency all new houses should be built to the highest environmental standards, with insulation, power generation and heating which makes them carbon neutral.</li> <li>2 The figures should be based on a housing provision that is needs based, starting from the latest 2018 ONS projections.</li> <li>3 These numbers should be allocated around the Borough on the basis of the current size of the towns.</li> <li>4 While land should be identified and allocated, it should only be released from the Green belt on an annual basis for that year's allocation. This should be done after reducing the numbers to take account of any brown field and windfall developments that have taken place in each town.</li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12288
<b>Person ID</b>	1269485
<b>Full Name</b>	NICOLA HULSE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	

<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12311
<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>The Housing Delivery Strategy comment</b>	<p>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.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12346
<b>Person ID</b>	1269490
<b>Full Name</b>	MIKE WHIT
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	There has not been an objectively assessed proven need of the number of new homes required in Dacorum. The population is decreasing so why on earth is there a need for hundreds and hundreds of new houses, the Council must look closely at this point because there is a great deal of discussion around this matter.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12387
<b>Person ID</b>	232349
<b>Full Name</b>	Mr Lawrence Parnell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><b>Housing.</b></p> <p>Brownfield. Despite the nationally acknowledged importance of Brownfield sites for new housing there is no reference to the role of Brownfield in the strategy for determining the location of new housing in Dacorum.</p> <p>Further, and important to Kings Langley as a whole, there is no indication that DBC is aware that TRDC has scheduled their entire Kings Langley Employment Area (30ha) as Brownfield. Indeed, Part 2, para.23.176 is states "...there are reasonable levels of employment available to the village, most of this is located in Three Rivers over which this Council has no control." It seems therefore that DBC is unaware of, let alone has consulted with TRDC upon the significant Permissions already granted - the loss of local employment and floor space at Astra Zeneca, West Herts College, Stannah House, Alpine Press and two former commercial sites in Primrose Hill - and their replacement by a substantial number of homes.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12403

<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>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12415
<b>Person ID</b>	1269503
<b>Full Name</b>	Mr Jan Wosiek
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>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.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12481
<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>The Housing Delivery Strategy comment</b>	<p>While accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, I have serious concerns regarding the sheer scale of proposed development. The Council has failed to take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>I also acknowledge that recent Government guidance on calculating housing need has been, at best, confusing. I firmly believe that housing needs should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. The Council has based its calculations on the outdated 2014 based ONS data which, in my opinion, would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12529
<b>Person ID</b>	
<b>Full Name</b>	
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No  
\* Yes  
\* No

**The Housing Delivery Strategy comment**

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.

More specifically, I would like to raise the following points:

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?

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.

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.

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>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12534
<b>Person ID</b>	1269456
<b>Full Name</b>	Mr & Ms R & C R & Wilby
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>• The national statistics for population indicate that between 2016 and 2040 the number of over 85 year olds will double from 1.6 to 3.2 million. How does your plan address this? Will you continue to grant permission for large family homes and innumerable flats while allowing the existing bungalow stock to be remodelled, developed and enlarged? Where do you propose to house this aging cohort who will have to travel long distances for hospital services?</li> <li>• The population continues to increase while services are decreasing. We have witnessed the loss of police stations in Tring, Berkhamsted and Hemel (we have currently nowhere to actually see a police officer face to face), our local Court House has gone, many doctors surgeries have been amalgamated, centralised and no longer located in local neighbourhoods. You granted permission to build a multi-story car park behind Waitrose in Berkhamsted providing additional commuter car parking for numerous London bound workers from Buckinghamshire and beyond.</li> <li>• There is nothing about providing homeless accommodation. No clear reference to Social Housing provision. No mention of sheltered and/or Housing Association property and no clear identification of homes for the elderly or handicapped. All I see is reference to 'affordable housing'. What does this actually mean?</li> <li>• 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).</li> <li>• Why no development in the Felden, Flaunden and Chipperfield? Is the greenbelt more valuable in these villages than in Northchurch?</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12535
<b>Person ID</b>	1269456

<b>Full Name</b>	Mr & Ms R & C R & Wilby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>• The national statistics for population indicate that between 2016 and 2040 the number of over 85 year olds will double from 1.6 to 3.2 million. How does your plan address this? Will you continue to grant permission for large family homes and innumerable flats while allowing the existing bungalow stock to be remodelled, developed and enlarged? Where do you propose to house this aging cohort who will have to travel long distances for hospital services?</li> <li>• The population continues to increase while services are decreasing. We have witnessed the loss of police stations in Tring, Berkhamsted and Hemel (we have currently nowhere to actually see a police officer face to face), our local Court House has gone, many doctors surgeries have been amalgamated, centralised and no longer located in local neighbourhoods. You granted permission to build a multi-story car park behind Waitrose in Berkhamsted providing additional commuter car parking for numerous London bound workers from Buckinghamshire and beyond.</li> <li>• There is nothing about providing homeless accommodation. No clear reference to Social Housing provision. No mention of sheltered and/or Housing Association property and no clear identification of homes for the elderly or handicapped. All I see is reference to 'affordable housing'. What does this actually mean?</li> <li>• 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).</li> <li>• Why no development in the Felden, Flaunden and Chipperfield? Is the greenbelt more valuable in these villages than in Northchurch?</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS12545
<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>The Housing Delivery Strategy comment</b>	<p><b>Table 2 [P37]</b> shows 5945 houses being built on ‘Strategic greenfield Growth Areas’ viz Green Belt of which around 1870 are allocated to Berkhamsted. We have questioned whether these can be considered ‘sustainable sites’; the further critical issue is whether it is desirable to impose 20% plus growth on the locality that already has severe infrastructure limitations as well as being constrained by proximity to AONB, Beechwood SAC etc.</p> <p>In so far as it applies to Berkhamsted, it does not endorse, SP4 – Delivering the Housing strategy</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12600
<b>Person ID</b>	1269563
<b>Full Name</b>	Ms Ella Porter-Lough
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>The Housing Delivery Strategy comment</b>	<p>To whom it may concern</p> <p>I want to object to the proposed new homes in our local area (Dacorum) for the following reasons:</p> <ul style="list-style-type: none"> <li>• The property numbers really concerns me the most. The 16,899 homes is a disproportionate increase considering the Governments projected population growth statistics. This is an unreasonable and unnecessary burden to undertake for our locality.</li> <li>• The impact of the proposed housing in our neighbouring towns of Tring and Berkhamsted, in addition to the 400 houses in Northchurch, will cause traffic congestion especially on our High Street. That's not discounting the obvious increased pollution and hazard this poses our children especially with our school placed right bang centre of the village with poor side-walks and access.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12669
<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>The Housing Delivery Strategy 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>

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.

#### 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** The Housing Strategy

**ID** EGS12678

**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

## The Housing Delivery Strategy 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.

### Minimum Housing Need and Future Methodology Changes

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.

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.

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.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12680
<b>Person ID</b>	1145844
<b>Full Name</b>	Dr and Mrs Melvyn Else
<b>Organisation Details</b>	
<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>The Housing Delivery Strategy comment</b>	<p><u>Housing Land Supply &amp; Windfall Development</u></p> <p>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.</p> <p>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.</p> <p>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%.</p> <p>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.</p>

This is a significant shortfall which can only be rectified by additional sites being identified across the Borough for housing allocations in the Local Plan. This includes ensuring that sites that could come forward for housing through windfall development, such as my client's site at Edgeworth House, is not restricted by any unjustified designations such as the Open Land designation of Edgeworth House as discussed further above in this representation.

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, including those such as my client's site at Edgeworth House which can contribute towards windfall development, as opposed to large, strategic sites with long lead in times and significant infrastructure requirements.

Policy SP20 'Delivering Growth in Berkhamsted' of the Emerging Strategy for Growth identifies the delivery of at least 2,236 dwellings in Berkhamsted over the plan period, including 143 dwellings of known commitments and 1,876 dwellings of Local Plan Strategic Allocations. The estimated number of dwellings to be delivered from windfall sites is 217 dwellings for Berkhamsted.

We consider that the estimation of the number of dwellings to be delivered in Berkhamsted is unrealistic on the basis that the urban area is already physically constrained to achieve this target. Furthermore, unjustified designations that could prevent windfall development coming forward, such as the Open Land designation of Edgeworth House, would further hinder the Council from achieving its required windfall targets. Windfalls are a finite but diminishing resource so should not be ignored when they arise.

The Edgeworth House site without the Open Land classification could also assist the Council in other areas where it has targets to meet as well as its obligations in the NPPF. Housing development for older people will be encouraged in the NPPF on sites close to good public transport, local amenities, health services and town and district local centres. Few other sites in the area can satisfy all the above in the way that is achieved by the Edgeworth House site. The Edgeworth site offers almost endless limits in terms of its potential in future plans. The site could well be large enough to assist with the primary school requirements of the area or contributing towards the community health care requirements of the area as alternatives to its contribution to housing. With the identification of Green Belt land to meet the areas growth requirements, whilst this might be necessary, sites such as Edgeworth House should be considered and fully assessed by the Council as a site for housing as a priority and ahead of Green Belt sites being released for housing as this would be consistent with the requirements of the NPPF.

### **Conclusion**

For reasons set out above in this letter, my client strongly objects to the identification of the site at Edgeworth House and associated surrounding land as an Open Land designation in the Emerging Strategy for Growth. It is requested that the Council remove the Open Land designation from the site as part of the continued preparation of emerging Dacorum Local Plan (2020-2038) beyond the current consultation of the Emerging Strategy for Growth.

**Included files**

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12684
<b>Person ID</b>	1269591
<b>Full Name</b>	Ross Campbell
<b>Organisation Details</b>	Client Director Aberdeen Standard Investments
<b>Agent ID</b>	1269593
<b>Agent Name</b>	Jessica Wilson
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p><b>Policy SP4 – Delivering the Housing Strategy</b></p> <p>DBC set out strategies for the delivery of the 16,596 net additional homes to be provided across the borough throughout the plan This includes the redevelopment of previously developed land, vacant or underused sites within the urban areas of the borough which is supported.</p> <p>The NPPF (2019) is clear that ‘<i>substantial weight</i>’ should be given to the value of using suitable brownfield land within settlements, especially where this would include development of under-utilised land and buildings to meet identified needs for housing. It is also stated that planning policies need to reflect the changes in the demand for land. This is considered particularly relevant for the current proposed designation of the Site as a General Employment Area which is discussed further below at para. 2.15 -20.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12759
<b>Person ID</b>	1269618
<b>Full Name</b>	Alistair Heath
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Secondly, I find the plan itself troubling as it is clearly designed to meet quotas from central government rather than cater for the needs of local people. From my research, there is much that suggest that the algorithm used to specify how many homes should be built in Dacorum is flawed. Furthermore, with these figures synthesised in 2014 they are outdated considering that London has lost a significant portion of its population due to the pandemic.</p> <p>Finally, I would like to raise the concerns I have around the destruction of agricultural and green-belt land. With the area around Berkhamsted considered as an outstanding area of natural beauty, I believe it would be a big mistake to degrade the quality of the surrounding area particularly at a time when so many of us are rediscovering our passion for the great outdoors.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12761
<b>Person ID</b>	1269618
<b>Full Name</b>	Alistair Heath
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Of course this plan is not just about the area near my childhood school to which I share an affinity, it is part of a wider picture – a picture which would see greenbelt land around Dacorum turned into housing to please a government quota whilst degrading the quality of life for local residents. All of the developments put strain on local infrastructure including roads, education, public transport and health facilities. The Local Plan does nothing to suggest that these issues of have been considered to the degree with which they need to be.</p> <p>As someone hoping to enter the property ladder in Dacorum, I am all too aware of the need for additional housing in the area. However, such development should be done in a way that minimises impact on our local ecosystems, provides affordable housing and preserves the standard of living that make Dacorum a great place to live. As I assess the local</p>

plan against these three tests, I see a plan which strives to satisfy the whims of Downing Street rather than these three crucial principles.

**Included files**

**Title** The Housing Strategy

**ID** EGS12768

**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

**The Housing Delivery Strategy comment**

**Housing Need and Supply**

Dacorum has a significant level of housing need and importantly, currently cannot demonstrate a deliverable five-year housing land supply. It will be important that the Local Plan resolves this issue and facilitates the release of sufficient sites to meet both the short and long term housing need in the area.

The minimum housing requirement

As a starting point, the Council have made an error in setting out a housing requirement based on the application of the Standard Methodology published for consultation by the Government in August 2020. After the consultation, it has been confirmed that the methodology set out in the August 2020 consultation will not be adopted and instead the previous methodology will be utilised, but with an uplift for the largest urban areas, which does not directly affect Dacorum.

The application of the correct methodology approach means that the Council should be planning to deliver a minimum of 1,023 homes per year, rather than the 923 homes set out in the draft Local Plan. The current draft Development Strategy to 2038 therefore looks to deliver some 1,819 homes less than the minimum requirement of 18,414 required over the plan period. This is a significant shortfall which will have to be rectified prior to the pre-submission version of the Local Plan being published for consultation, otherwise the Local Plan will be unsound.

Future methodology changes

The Standard Method 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 increase the minimum housing need further.

Although we are not aware of any further changes to be introduced prior to the preparation of the pre- submission version of the Local Plan, it will be important that the Council does not pre-empt the formal introduction of any revision or new standards and works to the methodology in place at the time the plan is prepared.

#### Unmet need from elsewhere

It is important that consideration is given to the need to meet unmet needs from neighbouring authorities, even if the Council do not feel it is possible for the area to absorb growth from elsewhere, given constraints such as Green Belt and AONB.

The Duty to Cooperate requires that such issues are addressed as part of a '*constructive, active and ongoing process*' with neighbours, irrespective of assumptions that constraints limit the potential of an area to accommodate additional growth. This was one of the issues that was raised through the recent examination of the St Albans Local Plan that the Council need to be aware of.

In particular, the area's strong links with London, with increasing migration over the last 10 years, mean Dacorum is likely to be affected by the inability of London to meet its 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 historical delivery rates of around 33,000 homes per year.

Without the Dacorum Local Plan making an allowance to meet London's unmet 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.

As alluded to further below, although not strictly a housing land supply issue, it will be important that employment land supply issues and growth strategies are discussed across boundaries as well, as these issues are intrinsically linked to efficient use of land in the area and the approach to delivering housing.

#### Housing land supply

In addition to this shortfall of some 1,819 homes identified above, the development strategy also appears to build in insufficient flexibility and contingency on the land supply side for the Local Plan to be considered effective.

Currently, the Local Plan includes just a 303 home buffer in land supply (around 2%) which is wholly insufficient, both in percentage terms and as an absolute number, to cater for under unforeseen delay in bringing sites forward for development or any other issues, such as a slow down in the rate of windfall development.

It is common for Local Plans to build in a 10-20% contingency on the supply side to allow for unexcepted delays in the delivery of sites, changes in site capacity, under delivery of windfall etc... The need for such a buffer depends on the risk associated with the overall strategy. This includes, the particular nature of the sites proposed for allocation and the step change in delivery being sought by the Plan, which in Dacorum is significant given the current adopted Local Plan target of 430 and recent delivery rates averaging around 544 homes over the last three years. This suggests the need for a buffer nearer 20%.

The implication of a 20% buffer would mean the Local Plan planning for 22,097 homes, some 5,197 homes more than currently planned for.

This is a significant shortfall which can only be rectified by additional sites being identified across the Borough for allocation and flexibility in the use of sites no longer required for their existing use.

It will be important that when additional land is identified, this seeks to ensure early delivery is possible, supporting the five-year land supply position. This suggests that sites immediately available, such as our client's site at London Road, Apsley, should be considered favourably for redevelopment, facilitated by appropriate policies in the Local Plan.

It will also be important when identifying additional land that the emphasis is on first identifying suitable, previously developed sites, in line with the NPPF requirement to make as much use as possible of brownfield land (paragraph 117).

**Included files**

**Title** The Housing Strategy

**ID** EGS12776

**Person ID** 1269628

**Full Name** Steven Bragg

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

Attached are comprehensive comments in relation to the Dacorum Local Plan Emerging Strategy for Growth 2020-2038.

The comments have been prepared by the Grove Fields Residential Association, in full consultation and engagement with all its members.

In addition to the thorough and detailed comments contained in the attached document, I would like to make the following broad points:

- I do not accept that total number of houses listed need to be built in Dacorum within the 2020-2038 timeline. Recent government strategy/policy indicates that as part of the national 're-balancing of the economy', there will be a

significant review of the number of houses that need to be built across the country. This 'reset' is likely to impact on the number of houses required in Dacorum, and indeed, the number may be reduced.

- The proposed c50% increase in the size of Tring has not been carefully thought through in practical, social, infrastructure and environmental terms. The proposal really looks like haphazard and lazy planning. c2,750 houses is likely to lead to an increase in vehicles in the area by c5,500 (at least two vehicles per property is not unusual in semi-rural locations and is unlikely to change dramatically in the next 20 years)
- The proposal to develop east of Tring is particularly ill thought through and smacks of identifying available land for sale, rather than suitable land for development. It is an Area of Outstanding Natural Beauty and a huge piece of green belt. The negative impact to the local environment would be significant. It is noted that developments in neighbouring Berkhamsted seem to be concentrated on 'brown field' sites with small adjoining pieces of green belt. This concept does not seem to have been considered sufficiently (at all) in the Tring proposal.

I look forward to seeing the developments of the Dacorum Local Plan Emerging Strategy for Growth 2020-2038 and hope that the comments listed will be seriously considered leading to significant adjustments to the overall strategy.

**Included files**

**Title** The Housing Strategy

**ID** EGS12779

**Person ID** 1269628

**Full Name** Steven Bragg

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.

It is not clear as to whether the "windfall" calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.

**Included files**

**Title** The Housing Strategy

**ID** EGS12783

**Person ID** 1269628

**Full Name** Steven Bragg

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.

Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.

**Included files**

**Title** The Housing Strategy

**ID** EGS12800

**Person ID** 1269633

**Full Name** Patrick Sherwen

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>However, in addition I would like to say that I understand there is a need for additional housing in this country, particularly of an affordable nature. This does not justify needless, irreversible damage to green belt land, in contradiction to government policy and the wishes of local residents, when there are preferable alternatives in the local area.</p> <p>Where the decision to override the policies that are rightly in place to protect the natural environment in an area of great beauty, in a way that would be irrecoverable, is made for purely commercial reasons, it cannot be supported. Only as a very last resort should this be considered and it seems clear that this is not the case here.</p> <p>Simply because plans of this kind have been couched in positive language, about sustainability and economic growth, does not change the nature of what is proposed.</p> <p>Please do not underestimate the importance and value of the beautiful greenbelt countryside around Berkhamsted. It is loved and appreciated by all who live here and who would choose to live here, and is an asset shared by the residents of many towns in this area. As officers charged with the responsibility to safeguard the wellbeing of local people and the town and its local environment, it is your duty to reject any schemes that do not prioritise the protection of something that once taken away, can never be returned, to the cost of us all, when better alternatives are available to achieve similar objectives.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12805
<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> * <b>Yes</b>	Yes

* No	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>The Housing Delivery Strategy is fundamentally flawed as the calculation has used an out of date and inflated housing target</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12826
<b>Person ID</b>	1144631
<b>Full Name</b>	Mrs Ann 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>The Housing Delivery Strategy comment</b>	<p>My comments on the Local Plan</p> <p>I start from a position that 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>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. As you will know, 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.</p> <p>As Dacorum will also be aware, to achieve such a level of house building will be more than has been achieved within the Borough before. To expect to maintain this level of development annually until 2038 is clearly unrealistic.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12847
<b>Person ID</b>	1145801

<b>Full Name</b>	Mr Guy Barlow
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy 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 residents.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12856
<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>The Housing Delivery Strategy comment</b>	<b>HOUSING NEED</b> The Council notes at paragraph 7.5 that it has progressed the emerging 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, in 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. The Council states that it will keep the housing figure under review and make any changes as necessary.

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 will revert back to 1,023dpa.

This increase from 922dpa to 1,023dpa results in a total requirement of 18,414 homes across the Plan Period. This is an increase of 1,818 homes above the 16,596 figure set out within the emerging Plan.

At present, the emerging Plan contains a supply of 16,899 homes over the Plan Period, only marginally above the Council's need when using the 922dpa figure. As such, the Council will need to update the Plan and find additional sources of housing supply in order to accommodate the higher level of need.

The Council 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. This will need to be addressed before the publication of the Regulation 19 Local Plan.

It is essential that the Council seeks 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 [Footnote 1: APP/A1910/W/20/3247645 (LPA ref. 4/02140/19/MFA)]. 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. 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% [Footnote

2<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>].

This demonstrates the acute need for housing in the area and the worsening of affordability. Therefore, the Council must ensure it has made every effort to meet and 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** The Housing Strategy

**ID** EGS12869

**Person ID** 1207443

**Full Name** Mrs Jennifer Bissmire

**Organisation Details** Clerk  
Markyate Parish Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**The Housing Delivery Strategy comment** The joint representation from the Town & Parish Councils cites the fundamental flaw in the Local plan in that the housing need is not supported with the latest information, there are also issues specific to Markyate where the Sustainable Development Strategy fails.  
Access to services and employment are limited so any increase in the number of houses planned for development in Markyate is not sustainable.

**Included files**

**Title** The Housing Strategy

**ID** EGS12914

**Person ID** 1269666

**Full Name** Mr Andrew Oliver

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Green belt land should only be built on in exceptional circumstances. As the planned number of homes per year is well in excess of the number recommended by the most recent ONS statistics, there are no exceptional circumstances justifying building on green belt land.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS12972
<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>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS12998
<b>Person ID</b>	1059698
<b>Full Name</b>	Mr Richard Lyne
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The Government-imposed housing target of 1,023 per annum (or the previous 922) just cannot be based on any sensible methodology. The Office of National Statistics shows the actual need to be 355. The Council should not strive to meet this high figure, egged on by the developers, but should surely challenge the figure rather than wreck our beautiful Borough by building expensive housing on green belt land.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13007
<b>Person ID</b>	330928
<b>Full Name</b>	Mr James Gregory
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	The delivery strategies are ambiguous, woolly and their application so ill defined it is unprofessional. It is impossible to understand how any strategy is employed. There does not seem to be one e.g where are the arrangements for schools, Doctors, Dentists, employment or shops?
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13020
<b>Person ID</b>	1164731

<b>Full Name</b>	Deborah 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>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13035
<b>Person ID</b>	1270011
<b>Full Name</b>	Mrs Nicola Davis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The brownfield sites should be priorities over greenbelt for housing.</p> <p>Also, Covid has changed the face of commercial / business properties for ever. They are never going to be back to the same level of occupation, so the Council should use these to convert to housing, retaining as much green land as possible.</p>

Councils need to preserve the local environment and not let developers profiteer.

**Included files**

**Title** The Housing Strategy

**ID** EGS13044

**Person ID** 1270013

**Full Name** Mr Daniel Ritchie

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

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.

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.

**Included files**

**Title** The Housing Strategy

**ID** EGS13084

<b>Person ID</b>	1270032
<b>Full Name</b>	MRS JILLY HENRY
<b>Organisation Details</b>	
<b>Agent ID</b>	1270033
<b>Agent Name</b>	MR JOHN C.E. PHILLIPS
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Only in so far as the strategy of concentrating new development in and around the main towns of the District is supported
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13107
<b>Person ID</b>	1270038
<b>Full Name</b>	LOU 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>The Housing Delivery Strategy comment</b>	1. Over-estimate of need generally. In the first instance, I believe that Dacorum Borough Council (DBC) has inappropriately adopted the government standard calculation of housing need as a mandatory target (which it is not) and in doing so has very significantly over-estimated future need for housing in the borough. This undermines the entire basis for the proposals presented. Proposals for excessively high numbers of additional dwellings for this area simply cannot be justified. The very latest (ONS 2018) full projections for housing need in Dacorum are calculated to be in the region of 355 dwellings per annum

(dpa). Even adjusting by MHCLG's standard algorithm (to 497dpa), the projected housing need in Dacorum is very close to the figure of 430dpa that is already contained (and is being fulfilled – and indeed being over-fulfilled for Berkhamsted) within the existing Local Plan. Those projections (either 355dpa or 497dpa) are however, both dramatically lower than the figure you use of 922dpa, or worse still, 1,023dpa (using the now very outdated, 2014 ONS data).

While it is clear that the demand for genuinely affordable and social housing remains unmet in the whole country, all other trend evidence is of a marked and sustained decline in housing need, as indeed is that of the ONS. Further, many official sources have yet to formally incorporate the decline in population that has resulted from Covid-19 and Brexit; decline which saw over 1m (EU and non-EU born) immigrants alone leave the UK in just the first 9 months of 2020 (according to The Migration Observatory). Also, In terms of distribution of housing need and availability of additional brownfield and infill sites nationwide, these data are yet to factor-in the priorities associated with the government's stated 'levelling up' agenda, or the inevitable fallout of Covid-19 that has led Ministers to call for a 're-imagining of our town and city centres to vibrant living spaces that are created where commerce and light industry once stood'.

There is not a single current piece of trend data for housing need that supports anything like the scale of development presented by DBC; indeed all the evidence shows a disparity that would only be set to widen during the life of the Local Plan. DBC must therefore reject the figures established by MHCLG, replacing them instead with data which they can show to be evidence-based, current, and which demonstrates the realistic falling trend over the life of the plan, for general housing need in Dacorum.

**Included files**

**Title** The Housing Strategy

**ID** EGS13119

**Person ID** 1264860

**Full Name** Alan Coughtrey

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

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 residents.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13135
<b>Person ID</b>	1270061
<b>Full Name</b>	Mrs Coughtrey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy 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 residents.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13147
<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>The Housing Delivery Strategy comment</b>	The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the

Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.

It is not clear as to whether the windfall calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.

**Included files**

**Title** The Housing Strategy

**ID** EGS13150

**Person ID** 1270066

**Full Name** Dr Amanda Cole

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment** Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.

Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.

**Included files**

**Title** The Housing Strategy

**ID** EGS13199

**Person ID** 1270127

**Full Name** Amy Moloney

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS13210
<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>The Housing Delivery Strategy comment</b>	<p>The Housing Strategy</p> <p>The housing strategy should reflect my vision given in question 1.</p> <p>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.</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**

**Title** The Housing Strategy

**ID** EGS13218

**Person ID** 1270128

**Full Name** Richard Salway

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

The strategy for Berkhamsted and Tring relies too heavily on developing expensive two storey dwellings rather than more affordable higher storey properties on brownfield sites.

The reliance on speculative developers to carry out this work will do nothing to ensure the affordability of housing, the plan does not protect against the risk that property prices will be artificially inflated by developers banking land, and/or building properties which are unaffordable to people who work locally.

This plan will create housing but will destroy great swathes of countryside. Properties will not be affordable to people working locally and the developments will draw in new commuter residents. The plan will not solve the housing shortage experienced by local residents and workers.

The number of dwellings proposed exceeds that which is sustainable for the combined capacity of the market towns of Berkhamsted and Tring. The infrastructure of these two areas is interlinked and interconnected. In terms of transport, their High Roads are linked by the main routes between the towns and the main arteries into the towns. They both also rely on the A41, the same train line and shopping facilities. There is no local hospital between the two towns. The two towns share the same bus routes. The delivery strategy takes no account of the combined pressure on the infrastructure which would be created by the combination of the proposed large house building projects in both Berkhamsted and Tring.

**Included files**

**Title** The Housing Strategy

<b>ID</b>	EGS13261
<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	No
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13281
<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>The Housing Delivery Strategy comment</b>	The proposed Policy DM5, in providing the principle of conversion of houses to flats and

non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.

It is not clear as to whether the " windfall" calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.

**Included files**

**Title** The Housing Strategy

**ID** EGS13285

**Person ID** 1270157

**Full Name** Ms Claire Laing

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.

Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.

**Included files**

**Title** The Housing Strategy

**ID** EGS13304

**Person ID** 211406

**Full Name** Ms Jennifer Habib

<b>Organisation Details</b>	Chiltern Society Planning Field Officer for Dacorum Chiltern Society
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ol style="list-style-type: none"> <li>1 Since at least one million EU citizens have returned to their own countries since Brexit, the overall number of people needing housing here is reduced.</li> <li>2 Our population is no longer all families, there are thousands of people who live alone, far more than in the past, and these people, both the young workers and the elderly, largely want an affordable flat, with no garden which needs maintenance they are not willing to do.</li> <li>3 Therefore the old formula of 2.4 people per house is no longer correct. The average number is more likely to be 2.0. and at least 40% of homes should be in three or four storey flats. These can be sensitively grouped in the lower lying areas so that their height does not spoil the cross landscape views.</li> <li>4 The area of Green Belt taken up by your figures must therefore be reduced, especially the area around the AONB which will be very badly impacted by housing coming up to its borders as has been shown.</li> <li>5 The wild life in our area is also greatly at risk, especially the chalk streams and their wild life, which are designated as a National Treasure, are unique to the UK and are easily destroyed by over use of water and too close building.</li> <li>6 I also request that you provide within the Local Plan guidance, that 40% of the housing units should be affordable flats.</li> <li>7 I also ask that before ANY Green Belt land is allocated for building houses, Every Brown field site within the Borough should be built on first and that every vacant shop and Office building which can be converted should also be counted in the proposed number of housing units required under the Local Plan. This will also reduce the area of Green Belt land which needs to be converted into housing.</li> </ol> <p>I therefore ask that you re-think the area of land needed for new housing units, reduce it as suggested above and provide more protection for the AONB areas, the chalk streams and the wild life corridors attached to them.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13324
<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>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Also fail to take into account post-pandemic working practices.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13337
<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>The Housing Delivery Strategy comment</b>	As you will discern from my address I live in Kings Langley and have done so for more than 28 years. I am very interested in what the future holds for Kings Langley in both the Dacorum Borough Council (DBC) area and the Three Rivers District Council (TRDC) area. Accordingly, I am very concerned about what I have read in the DBC Local Plan and wish to make the following comments:

1 The plan states that the housing need for Dacorum for the plan period is 16,500 dwellings or 922 per year. These numbers are based on the 2014 assessment by the ONS. I do not believe the plan should be based on such inflated numbers when the more up to date 2018 ONS figures are significantly lower. Further, Brexit has taken place as well as the pandemic, both of which are likely to further reduce the actual housing need in the Borough. This reduction could be as much as 50% and yet the plan still contains large swathes of Green Belt land being allocated for housing that is I therefore object to the number of dwellings the plan seeks to build and the location of any of these dwellings on Green Belt land, which is designated as such in order to prevent such land being developed.

**Included files**

**Title** The Housing Strategy

**ID** EGS13352

**Person ID** 490211

**Full Name** Ms Barbara Saville

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy 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** The Housing Strategy

**ID** EGS13363

**Person ID** 924129

**Full Name** 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>The Housing Delivery Strategy comment</b>	(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13376
<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>The Housing Delivery Strategy comment</b>	The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.

It is not clear as to whether the // windfall// calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.

**Included files**

**Title** The Housing Strategy

**ID** EGS13380

**Person ID** 1270224

**Full Name** Ms Heather Wignall

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment** Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.

Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.

**Included files**

**Title** The Housing Strategy

**ID** EGS13390

**Person ID** 1153922

**Full Name** Roger Hyslop

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>The Housing Delivery Strategy comment</b>	(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. I have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13446
<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>The Housing Delivery Strategy comment</b>	<p>Section 7 The Housing Strategy</p> <p>The exceptionally large Government target for new homes has given Strategic Planning an almost impossible task because of the high proportion of Green Belt land within the borough. It is also one of the few local authorities that has a significant amount of land designated as AONB, the boundaries of which it has no authority to change.</p> <p>The allocation of sites for housing was mainly based on the assessments of sites put forward by developers, landowners and agents under the 'Call for Sites' exercise. Whilst this procedure has previously given sufficient scope to achieve housing targets whilst properly respecting major constraints, it has failed to do so this time against such an exceptional increase. This ought to have been apparent at the start and much more effort should have been made then to identify all possibilities, not just those from the traditional 'call for sites'. It seems that a belated effort was made to do this and two large but currently unavailable sites were indentified outside the Green Belt and the AONB with one on previously developed land. There does not however appear to be any evidence that a thorough search has been made and that there are no other such sites that might be available.</p>

On the 16th December 2020 the Government published several documents detailing changes to their housing policy. These consisted of their response to the local housing need proposals in "Changes to the current planning system", a new higher indicative local housing figure for Dacorum of 1023 per annum and a written ministerial statement.

The annual increase in the indicative figure has resulted in an increase of 1818 new homes for Dacorum above those used as a basis for the consultation.

This new Government guidance has a significant impact on the Dacorum Local Plan making it now out of date and could therefore be considered unsound if not revised before submission.

Another specific outcome is a requirement for a 35% increase in housing plans for the 20 largest cities in England in order to meet the 300,000 national target. This underlines the policy to concentrate housing on larger towns and cities and places more emphasis on avoiding harm to Green Belts and protected landscapes such as AONBs. "We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places" and "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"

The Government response also refers to the NPPF in regard to the number of houses "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."

Paragraph 11b of the NPPF makes it clear that policies should provide for housing needs unless: "the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area" Assets of "particular importance" include Green Belt land and Areas of Outstanding Natural Beauty

The ministerial written statement also says that" 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 journeys."

For the Dacorum Local plan this ought to mainly mean around Hemel Hempstead station which is fact identified in the plan for further development. However more work ought to have been done to identify land for more homes in that area. Whilst that might mean using some Green Belt land it is some distance from the AONB which is of much greater importance

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13483
<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>The Housing Delivery Strategy comment</b>	<p>3. Statistical Basis of the Plan (the 'numbers')</p> <p>The housing need analysis 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 to using the most recent 2018 data which would indicate a 'need' of around 350 dwellings pa. In December 2020, the UK government acknowledged that the formula for locating housing development should be reformed.</p> <p>Even given the overestimated level of housing, 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. The current DBC proposals are against government policy.</p> <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. There is no requirement for councils to build homes to support local economic growth and therefore no extraordinary reason or need for the Green Belt to be encroached upon.</p> <p>DBC should challenge the proposed housing numbers – which are dictated by central Government, rather than just accept them.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13526
<b>Person ID</b>	1270291
<b>Full Name</b>	Mr Mark 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>The Housing Delivery Strategy comment</b>	1000+ homes sounds like a new town – with the abundance of nearby open countryside, why not build a new town with it's own infrastructure – this would make far more sense and you can have more control to realise your vision for that development.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13540
<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>The Housing Delivery Strategy comment</b>	<p>The housing strategy should reflect my vision given in question 1.</p> <p><b>Overarching Vision: Environmental Sustainability</b></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><b>Berkhamsted &amp; Tring Developments</b></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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS13560
<b>Person ID</b>	1270302
<b>Full Name</b>	Ms Hannah AlQadhi
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	If building in Dacorum is absolutely necessary, look to the town centres, particularly the Marlowes - Debenhams will make good flats.  Keep away from Green Belt
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13590
<b>Person ID</b>	1270310
<b>Full Name</b>	Ms Eleanor Jelf
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	This plan will create housing but will destroy great swathes of countryside. Properties will not be affordable to people working locally and the developments will draw in new commuter residents. The plan will not solve the housing shortage experienced by local residents and workers. The number of dwellings proposed exceeds that which is sustainable for the combined capacity of the market towns of Berkhamsted and Tring

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13592
<b>Person ID</b>	1270310
<b>Full Name</b>	Ms Eleanor Jelf
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	For all sites and proposals: review buildings in urban areas across Dacorum to consider those no longer in business use for conversion to residential use.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13610
<b>Person ID</b>	1270319
<b>Full Name</b>	Ms Nicola Withers
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	DM5 - opportunity to deliver house conversions from non-residential properties makes good use of pre-existing developments.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13613
<b>Person ID</b>	1270319
<b>Full Name</b>	Ms Nicola Withers
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13625
<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>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “ windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13628
<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>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13641

<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13658
<b>Person ID</b>	1259288
<b>Full Name</b>	Maria de Farago Botella
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>1. Affordability: There is a high need for affordable housing in Dacorum. What is affordable? Minimum wage vs average salary for 1st time buyers currently seeking housing in Dacorum. It should be housing for all and sustainable. People in the waiting list for Dacorum housing should be the priority as well as young people. Average house price in Dacorum is currently very high.</p> <p>2. New housing to be Carbon neutral and zero carbon emissions.</p>

3. Numbers of new houses and where. We all know about the need of housing. How many and how to build them is key for sustainability. Post COVID UK and post Brexit needs to be taken into consideration for this plan. There are many office spaces available in London and large towns which could become new housing, as many people will not come back to offices. Has it been thought how many people and from where they will be using the new housing? Tring and Berkhamsted need to stop attracting just wealthy people looking for bigger houses in leafier areas near London with the consequence of never ending house price increase. It should be housing for all and people already in Dacorum prioritised.

4. Transport and infrastructures need to be in place to absorb lots more population in a green sustainable way such as a modern and efficient bus service, affordable, electric to connect towns in Dacorum to stop dependency on cars and fossil fuel, also cycle paths and footpaths to encourage exercise.

5. Good Community: guarantee green spaces, safe play and indoor multi-purpose space to include Youth. Protect current natural ecosystems and create new ones in proportion to area developed to be given back to the community.

**Included files**

**Title** The Housing Strategy

**ID** EGS13670

**Person ID** 1207133

**Full Name** Chilterns Conservation Board

**Organisation Details** Chilterns Conservation Board

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

Section 7 – Housing Strategy  
Object. pp.35-40, policy SP4.

The fundamental flaw in the council’s thinking about the levels of development anticipated in the draft local plan is evident from the summary of national policy given in support of the housing strategy in paragraph 7.2. CCB specifically objects to this paragraph. This summary omits a key element of national planning policy, in that, while the NPPF does strongly encourage LPAs to meet development needs, the NPPF paragraph referred to here (paragraph 11), explicitly notes that such needs should be met unless “the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”. 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.

The omission of that exception, in a borough almost entirely covered by either AONB or Green Belt, is critical, to the point of appearing to be deliberately misleading to the plan’s readers.

The remainder of the housing strategy section, including table 2 and policy SP4 itself, is therefore constructed as if both the target figure of 16,900 homes, and the numbers into which that is broken down in table 2, are written in stone – even that the 16,900 figure is the result of adding up the other figures from that table, as if they were predetermined.

This impression is not helped by table 2 beginning with the (false) statement concerning the “number of homes required to be built” (my emphasis). This is again a misrepresentation of government policy. The estimate of housing need derived by the “standard method” is, explicitly “the first step in the process of deciding how many homes need to be planned for” (PPG Paragraph: 001 Reference ID: 2a- 001-20190220), not a requirement in itself.

The CCB therefore objects to table 2.

In addition, table 2 uses different terminology from the supporting text. It would be clearer to use the categories listed in paragraph 7.6 (although some of those are ambiguous), in order to give greater clarity as to which elements are related to existing planning permissions, existing unimplemented allocations from earlier development plans (including any uplift from anticipated “increased delivery on allocated sites”), sites already identified on the council’s brownfield register or through the urban capacity study, etc.

Ultimately, the key function of this analysis is to reveal how the amount of development that the plan needs to accommodate on previously unidentified sites, so it needs to be clear and robust, and demonstrate how the capacity of suitable new sites has been assessed. There is no explicit indication in this section of how the “strategic greenfield growth areas” have been identified and their capacity quantified – indeed that term is not even defined.

The only conclusion that can be drawn from this, is that the housing strategy and policy SP4 are based on a slavish adherence to the housing need estimate derived from the “standard method” and has not followed the requirement of NPPF paragraph 11(b) that this figure should be reduced in a borough largely constrained by AONB and/or Green Belt, nor have the sites selected and the amount and distribution of development apparently been considered through a land availability assessment (although the evidence listed on p.40 refers to a “greenfield site assessment” that is not listed (by that name) on the council’s website.

The CCB therefore objects to policy SP4.

**Included files**

**Title** The Housing Strategy

**ID** EGS13730

**Person ID** 223941

**Full Name** Mrs Cathy Davidson

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13744
<b>Person ID</b>	1270368
<b>Full Name</b>	Mr Charlie Laing
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “ windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13747
<b>Person ID</b>	1270368
<b>Full Name</b>	Mr Charlie Laing
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13757
<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

**6. Lack of will to challenge the numbers in principle.** In the Housing Topic paper it states that DBC has always met the government targets. There is an aspiration to meet the targets set nationally, which will release national government funding.

- The NPPF states that certain characteristics should be taken into account for the housing numbers delivered (eg. an AONB or National Park). As the Chiltern Conservation Board officer notes in a response to the South Oxfordshire Local Plan: *“The consultation paper reiterates the position that the standard method currently provides the “starting point” for planning for housing and “does not establish the housing requirement”. As with the existing NPPF and PPG, the paper is silent on how LPAs are expected to move from their standard method figure to a sustainable local plan housing requirement. Experience suggests that the reality, both in plan-making and in decisions on planning applications and appeals, is that the standard method figure is often taken as being the housing requirement. In practice, LPAs are expected to plan to meet, and preferably to exceed, the standard method figure, and reductions of that figure to account for environmental or policy assets (rather than an absence of developable land within the council area) appear in practice to be rare.”*

**7. Lack of will to fully investigate and action brownfield sites.** The site selection paper says the *“Plan should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs .”* It also states that *“Chapter 13 of the NPPF focusses on protecting Green Belt land. Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.”*

7.1 Furthermore: *“2.18 Before concluding that changes should be made to the Green Belt, the following must be considered: Make as much use as possible of suitable brownfield sites and underutilised land”*

7.2 The housing options paper states that as well as looking at the available sites, it take into account the practicalities of developers bringing forward housing on sites in a timely manner. It states that it is harder to get developers to work with brownfield sites than green field ones. With brownfield sites there are clearance costs, and checks for contamination (plus potential costly de-contamination processes). So despite the NPPR specifically urging local councils to consider brownfield sites as a priority, it is a clear policy of DBC to go for the easier option of giving developers their preferred (cheaper) option. Indeed the green belt is predominantly already owned by developers as there has been a huge speculative land grab in recent years (more on this in the next point). I welcome the redevelopment of brownfield sites like Jewsons in Berkhamsted, and more effort is needed to encourage brownfield development, before considering releasing areas of green belt.

7.3 When the CPRE reviewed the OAN process in 2015, one of the points made was around the sudden increase in numbers required:

*“The impact of increasing provision targets: establishing higher housing targets, at times dramatically, either means raising densities on existing sites (where appropriate) or identifying additional developable sites. Rather than brownfield*

*or regeneration-led, attractive ‘market favoured’ sites are easier to develop, and are likely to be developed first, which results in increased pressure to build additional housing in the countryside, irrespective of infrastructure requirements. This defeats good planning; it is the antithesis of what planning should try to achieve, to intervene by giving greater weight to factors the market will not recognise or which are given lesser priority.”*

**8. Affordability.** There is a notable absence of challenge to the assumption that over-supply will bring house prices down to a more affordable level.

- There has been much debate around the lack of genuinely affordable housing – which is indeed a problem. The ‘affordable’ quota on developments is only a % below market value. The wider issue is that prices overall remain out of reach of many first time buyers, and this house-building project will not change that. Since the NPPR was drafted, there has been a huge amount of speculation by developers in land as a commodity, and also in land trading prices. As a result, the price for development land has shot up, meaning the developers’ margins are tighter, and they subsequently prefer and need to build ‘luxury’ houses rather than more modest family homes. They will be less inclined to include a substantial amount of ‘affordable’ homes, and also be less inclined to cost in carbon neutral building practices.
- See the following articles:

<https://www.theguardian.com/cities/2017/jan/31/britain-land-housing-crisis-developers-not-building-land-banking>

<https://www.fwi.co.uk/business/housing-need-pushes-farmland-1macre>

- This was also the conclusion of the Communities and Local Government Committee report into ‘Capacity in the Homebuilding Industry (28 April 2017)

[https://publications.parliament.uk/pa/cm201617/cmselect/cmcomloc/46/4603.htm#\\_idTextAnchor004](https://publications.parliament.uk/pa/cm201617/cmselect/cmcomloc/46/4603.htm#_idTextAnchor004)

Summary:

*“It is clear that the housing market is broken and that as a country we have not been building enough new homes for some time. We launched this inquiry therefore to understand whether the homebuilding industry is capable of boosting housing output and to identify what challenges need to be overcome if the country is to meet the growing demand.*

*We have found a homebuilding sector that is dominated by the biggest companies. The eight largest firms build more than half of all new homes, which means we are overly reliant on an alarmingly small number of commercial actors. The large developers are often accused of landbanking (holding on to land to artificially restrain supply in order to maintain high house prices), and while we have not seen evidence of this, we have found that there is little incentive for volume housebuilders to build any quicker. It is in their commercial self-interest to maintain profits and they cannot be blamed for this. However if the country is to build the homes it so desperately needs, then we need to reduce the dominance of the high volume builders by encouraging a far greater mix of developers.*

*We have identified the land market as an area that requires particular attention and we hope our successors will return to this issue. We are concerned that the market for development land is so tight in higher demand areas that speculative developers are forced to pay inflated prices upfront for the land. The developer will then seek to recover their investment*

*by increasing density, reducing the levels of affordable housing and building more slowly to ensure that local markets are not saturated and house prices do not fall. A subsequent inquiry might explore the feasibility of increased public intervention in the land market to incentivise schemes that prioritise long-term community benefits over short-term commercial profit.”*

**9. Lack of consideration of the character of the individual towns before deciding the proportion of houses to build in each place.**

- The principle of not joining settlements together has been observed and upheld, which is important, but more thought needs to be given to the impact of development at this scale. This is relevant when looking at the percentage increase in the size of each town. What is the impact of a 24% increase in Berkhamsted on the current population and the character of the town? Similarly, what are the impacts of a 50% increase in the population of Tring on the character and existing population?
- **This demonstrates that the housing numbers are not related to the current needs of local populations, more to the potential wider demand, and the capacity the national government thinks each area should be able to cope with in the future. It cannot seriously be argued that the existing population of Tring has an unmet need of 50%.**

**Included files**

**Title** The Housing Strategy

**ID** EGS13806

**Person ID** 1163978

**Full Name** John Wignall

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.

Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13815
<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>The Housing Delivery Strategy comment</b>	The delivery strategies include a large amount of greenbelt which we do not consider 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.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13889
<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	

## The Housing Delivery Strategy 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.

**Included files**

**Title** The Housing Strategy

**ID** EGS13915

**Person ID** 1207810

**Full Name** Louisa Groves

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

You are proposing to deliver too many new homes and this needs to be reconsidered.

Infrastructure - you mainly talk about roads and transport. Where is the infrastructure for water amenities. These have simply not been considered clearly in your proposal. This is very worrying.

**Included files**

**Title** The Housing Strategy

**ID** EGS13923

**Person ID** 1270392

**Full Name** Ms Anna Skingley

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “ windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13926
<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> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS13987
<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>The Housing Delivery Strategy comment</b>	<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>Title</b>	The Housing Strategy
<b>ID</b>	EGS14014
<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>The Housing Delivery Strategy comment</b>	I would prefer to see new town (s) built in Dacorum with the correct infrastructure and amenities designed in from the outset instead of bolt-ons to existing towns which is never particularly satisfactory. It is not my place to suggest alternative sites as I am not aware of land ownership status across the borough, but I'm sure this information is available, or could be obtained by the officers of Dacorum Borough Council and the necessary land could be acquired if necessary
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14017
<b>Person ID</b>	1270425
<b>Full Name</b>	EMMA 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>The Housing Delivery Strategy comment</b>	<p>Additionally, there is a tension between the Adopted Core Strategy (2013-2036) para 6.2.8 which identified capacity (not "need") for new housing in Berkhamsted of 600 and the draft Local Plan which (only eight years later) indicates that it is possible to sustainably build an additional 1600 homes in Berkhamsted. Berkhamsted town centre already suffers from congestion and poor air quality. The consultation document suggests that the substantial increase in housing proposed for Berkhamsted will enhance the quality of life for the current and future residents. Again, this is baffling to existing residents of the ridge area of Berkhamsted who have already seen a significant increase in traffic, pollution and congestion as a result of the many developments within the current</p> <p>Local Plan. A targeted consultation with local residents in this area should be carried out to explain in detail how the proposed development could be sustainable and specifically how these developments will enhance quality of life</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14027
<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>The Housing Delivery Strategy comment</b>	Brownfield sites are likely to become available in the short to medium term. While the Plan is long term, it is not flexible enough to take this fact into account. It merely identifies land for development now.
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14056
<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	
<b>The Housing Delivery Strategy comment</b>	I strongly object to the proposal of 16,000 new homes being built primarily on 850 hectares of green belt around Tring, Berkhamsted and Hemel Hempstead in the next 18 years. This growth is a 25% increase over the current housing stock and would change the character of our towns and villages and destroy valuable green belt habitat and amenity.

I appreciate there is a need for new sustainable and affordable housing to be built, but the latest ONS data available projects 6,051 new homes in Dacorum by 2038 - 64% less than this Local Plan projects.

**Included files**

**Title** The Housing Strategy

**ID** EGS14064

**Person ID** 1270476

**Full Name** ALISON CHESHIRE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

The delivery strategies rely on the release of Green Belt land. **There is no justification for the release of green belt land.**

The housing target is not a true reflection of objectively assessed need for the area.

The Green Belt across the Borough is **critical** to people who live here now, but also for future generations. **It is our duty to preserve the Green Belt.** This plan fails spectacularly in this duty and for this reason alone, I cannot support this madness.

**Included files**

**Title** The Housing Strategy

**ID** EGS14077

**Person ID** 1270478

**Full Name** HANSEN L & H

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	The housing strategy doesn't take into account new working practices after Covid and Brexit and the housing targets are flawed. It seems to be a developer led exercise rather than actually considering the constraints in Berkhamsted. The developers want to build in Berkhamsted as it is profitable even though the locations aren't sustainable and they are not building the right homes in the right places. The housing number is not enough for Green Belt to be released. Exceptional circumstances for releasing Green Belt have not been demonstrated in any of the consultation documents.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14092
<b>Person ID</b>	1261168
<b>Full Name</b>	Pat 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>The Housing Delivery Strategy comment</b>	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 the required infrastructure, coupled with significantly better public transport and connections than Tring.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14097
<b>Person ID</b>	1270485
<b>Full Name</b>	Mr Colin Poole
<b>Organisation Details</b>	

<b>Agent ID</b>	1261397
<b>Agent Name</b>	Chloe French
<b>Agent Organisation</b>	Planning Associate Bidwells LLP
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p><b>Housing Need and Supply</b></p> <p>The Council expect this plan to deliver 16,900 homes over the plan period. This is however significantly below what the plan should be delivering. Although we sympathise that this plan has been prepared in a turbulent time in terms of the pandemic and the changes to Standard Methodology, the most recent Government consultation published in relation to Standard Methodology sets the Dacorum housing numbers at a minimum of 1,023 new homes per year between 2020 and 2038. This equates to a <u>minimum</u> of 18,414 dwellings. The affordability ration would also need to be considered when it is due to be published in March 2021.</p> <p>Notwithstanding this fundamental under provision, Paragraph 60 of the NPPF requires Councils to consider the unmet need of any neighbouring areas. Although it is acknowledged that Dacorum are working with their neighbours in South West Hertfordshire, the unmet need of other authorities must also be considered.</p> <p>Furthermore, given Dacorum's proximity to London, and the significant unmet need that they are facing, it would be reasonable for the neighbouring Hertfordshire authorities to work with the London authorities to accommodate some of the unmet London need. It has been well documented that the pandemic has changed commuting patterns with those working in London wanting to move out of the city given the provision of more flexible working practices. This will undoubtedly impact on housing demand within Dacorum and should therefore be planned for within this Plan.</p> <p>Not only is there an insufficient quantum of development planned for, there is also a failure to include an appropriate buffer, which will further exasperate the under provision. The deficit in housing numbers should be rectified now, prior to the pre-submission version of the Local Plan so that proper consultation can be undertaken as well as ensuring a robust and durable Local Plan covering the appropriate plan period. Currently, the Local Plan includes a 2% buffer in land supply (303 homes – paragraph 7.128 of the draft Local Plan). This level of contingency is wholly insufficient, both in percentage terms and as an absolute number.</p> <p>We believe that a buffer of 20% should be included within the Plan. This is justified based on the historic delivery of housing (an average of around 544 dwellings per annum for the past three years); as well as the percentage of larger, more complex sites; and potential fluctuations in demand resulting from the duty to cooperate with neighbouring authorities. A 20% buffer would mean that the Local Plan should be planning for 22,097 homes in the plan period, but even at 10% the number of homes would be 20,255. These figures suggest a deficit in planned housing development of between 3,355 and 5,197 homes.</p>

This is a significant shortfall which can only be rectified by the additional sites being identified across the Borough for allocation. This will obviously impact on the 5-year housing land supply, so it will be vital that smaller, deliverable sites are able to come forward within the next 5 years to meet the current level of demand and ensure that the supply is not backloaded.

It is therefore concluded that in its current form, the Local Plan has not been positively prepared and current housing shortages will be exasperated without the inclusion of more sites to accommodate the identified need.

### Summary and Conclusions

This Local Plan fails to sufficiently plan for the housing demand for Dacorum. The proposed supply is considered to be between 3,355 and 5,197 homes short of the actual housing demand. The deficit has been largely caused by a failure to account for the revised standard methodology as well as an insufficient buffer.

Small development sites have a key role in ensuring much needed housing delivery in the short term and should therefore be balanced against the larger more strategic sites which often take years to come to fruition. Smaller sites will be easier to bring forward in the short term and help provide much needed housing now.

We welcome the inclusion of Policy DM8; however, believe that changes are required to the policy to ensure that it delivers SCB plots. Specific land should be identified within the Local Plan to deliver SCB plots. This will add to the diversity of the housing market and meet the requirements of the Right to Build. As currently worded, the inclusion of plots on larger sites only will fail to meet the rolling three-year requirement, particularly in the early years of the plan.

It is therefore concluded that in its current form, the Local Plan has not been positively prepared and current housing shortages will be exasperated without the inclusion of more sites to accommodate the identified need.

#### Included files

**Title** The Housing Strategy

**ID** EGS14132

**Person ID** 1263506

**Full Name** Ian Brown

#### Organisation Details

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the "windfall" calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14135
<b>Person ID</b>	1263506
<b>Full Name</b>	Ian 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>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14147
<b>Person ID</b>	1163439

<b>Full Name</b>	Lindy Weinreb
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Housing Land Supply Table 2 [P37] shows 5945 houses being built on 'Strategic greenfield Growth Areas' viz Green Belt of which around 1870 are allocated to Berkhamsted. I have questioned whether these can be considered 'sustainable sites'; the further critical issue is whether it is desirable to impose 20% plus growth on the locality that already has severe infrastructure limitations as well as being constrained by proximity to AONB, Beechwood SAC etc. In so far as it applies to Berkhamsted, it does not endorse, SP4 – Delivering the Housing strategy
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14170
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS14202
<b>Person ID</b>	1264035
<b>Full Name</b>	Alex Knowles
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	I find it an absolute tragedy that your growth strategy proposes over 16000 new homes for Dacorum, with over 400 in Northchurch. The statistics show that this does not marry with expected population growth, and also is based on 2014 figures from the government mandate giving 1023 per annum. Whereas the latest 2018 figures are 497 per annum, therefore meaning your projected growth is double what is needed. It is also deceitful to propose such growth on past figures which have since been updated. Greenbelt by law must only be built on if necessary and these statistics you have put forward therefore mean the proposed growth is not necessary. There is also no information as to why you deem it necessary to develop our greenbelt so heavily? The value of the greenbelt land is not being considered for the physical and mental health of Dacorum residents.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14213
<b>Person ID</b>	1270572
<b>Full Name</b>	Bloor Homes South Midlands
<b>Organisation Details</b>	Bloor Homes - South Midlands
<b>Agent ID</b>	210986
<b>Agent Name</b>	Mr Stephen Harris
<b>Agent Organisation</b>	Senior Consultant

Emery Planning Partnership

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

**The Housing Delivery Strategy comment**

Housing Requirement

- The housing requirement in SP4 of 922 dwellings per annum was based on the draft Standard Method published by the Government in August 2020. At the time of preparing this Plan and in accordance with paragraph 60 of the Framework, the LPA should have proceeded with the published Standard Method of 1,023 dwellings rather than the lower draft Standard Method. The publication of the new Standard Method in December 2020 means that the matter of which figure to use is resolved and the LPA should now proceed with urgency on preparing a plan to meet the Standard Method figure of 1,023 dwellings per annum. Over the plan period this means that the housing requirement in SP4 needs to be increased by 1,818 dwellings which equates to 18,414 dwellings in the plan period.
- This will require further allocations in addition to those proposed in the current plan.

Delivering the Plan requirement

- Whilst we agree that an allowance should be made for flexibility, we disagree that the flexibility allowance should be just 8% which equates to only 303 dwellings. It should be increased as such a minimal allowance provides insufficient flexibility to respond to changing circumstances, i.e. slippage in the delivery of housing from strategic sites, as required by the Framework. Indeed, it would only take one site not delivering as expected for the housing requirement not being met. This would have serious implications in terms of the failure to meet the identified housing need.
- We consider that a higher flexibility allowance is required, in the order of 20%. This would give a reasonable degree of security that should sites not deliver at the rates anticipated that the housing requirement would be met in the plan period.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS14215

**Person ID**

1270572

**Full Name**

Bloor Homes South Midlands

**Organisation Details**

Bloor Homes - South Midlands

**Agent ID**

210986

**Agent Name**

Mr  
Stephen  
Harris

<b>Agent Organisation</b>	Senior Consultant Emery Planning Partnership
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>Policy SP4 sets a minimum housing requirement of 16,596 net additional dwellings for the period 2020 to 2038 which is an average rate of 922 dwellings per annum (dpa). This figure was calculated using the Government’s draft Standard Method in August 2020.</p> <p>Paragraph 60 of the Framework which states:</p> <p><i>“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.”</i></p> <p>Local Housing Need is defined in Annex 2 of the Framework:</p> <p><i>“The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).”</i></p> <p>In the context of national guidance, the Council should have applied the Standard Method figure and not the lower draft Standard Method figure of 922 dwellings. It is not necessary to pursue this point in greater detail as the Government’s revised Standard Method was published in December In that context we note that paragraph 7.5 of the DLP states:</p> <p><i>“The Local Housing Needs Assessment has helped us understand what our housing requirement should be. 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. <b><u>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. (our emphasis)</u></b></i></p> <p>For Dacorum, there has been no change to the standard method and therefore the starting point for the Local Plan is 1,023 dwellings per This is an uplift of 101 dwellings per annum from that set out in Policy SP4 which equates to 1,818 dwellings over the plan period. The new Standard Method figure should now be applied.</p> <p>As the LPA will be aware, the wider context to the application of the standard methodology is to deliver for 300,000 homes across England. In their statement dated 16th December 2020, The Government state:</p>

*“In Changes to the current planning system, the government set out the importance of building the homes our communities need and putting in place measures to support our housing market to deliver 300,000 homes a year by mid-2020s. We set out that our proposed changes to the standard method were based on overarching principles as stated in paragraph 17 of the consultation. These were ensuring that the new standard method delivers a number nationally that is consistent with the commitment to plan for the delivery of 300,000 new homes a year, a focus on achieving a more appropriate distribution of homes, and on targeting more homes into areas where there are affordability challenges. We remain committed to these principles.”*

The total of the Standard Method for each authority in England is 297,605 dwellings per It is clear that each LPA should be planning to meet its Standard Method figure as a minimum in order to play its part in meeting the nation’s housing needs.

The Standard Method is only the starting Paragraph 2a-010-20201216 of the PPG states:

***“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”***

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently- produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”*

The evidence base states that the circumstances in Dacorum do not provide justification for the application a higher housing need figure than the standard method. We do not propose any further uplift at this stage but we do note the ongoing preparation of the Hertfordshire Proposition (Growth Deal) which has a housing target to 2031 of just under 100,000 dwellings. That bid is to be finalised and submitted to DCLG so is not a justification for any further increase at

this stage but may be material at subsequent stages. The overall ambition nevertheless demonstrates that the Standard Method must be delivered as a minimum.

Dacorum has accepted that Green belt land is required which we support, but even if all the current allocations are retained, sites to accommodate a further 1,818 dwellings need to be We set out the compelling case for Waterside Way now to be allocated later in this Statement.

The Housing Trajectory (Appendix 4) sets out the expected delivery of the committed and allocated sites. The breakdown is:

[SEE ATTACHED PDF FOR TABLE 2: SOURCES OF HOUSING LAND SUPPLY TABLE]

This raises a number of key points which raises questions as to whether sufficient land has been allocated.

Paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development. For plan-making this means that:

- 1 *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- 2 *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - 1 *the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - 2 *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.*

The approach to flexibility is set out in paragraph 13 of the Plan. It states:

*“7.13 While forecast delivery does vary against the annual housing need figure over the Plan period, there is a sufficient housing land supply of deliverable and developable housing sites to satisfy the requirement to 2038 and modestly exceed it by approximately 300 homes.”*

The housing trajectory is projected to deliver 16,899 dwellings in the plan period against the housing requirement of 16,596. This is a flexibility factor of 8%.

[SEE TABLE 7.6 - HOUSING PROGRAMME SUMMARY 2020 TO 2038 IN ATTACHED PDF]

Whilst we agree that an allowance should be made for flexibility, we disagree that the flexibility allowance should be just 1.8%. It should be increased. We consider that this clearly provides insufficient flexibility to respond to changing circumstances, e. slippage in the delivery of housing from strategic sites, as required by the Framework. Indeed, it would only take one site not delivering as expected for the housing requirement not being met. This would have serious implications in terms of the failure to meet identified housing need.

The Local Plans Expert Group published its report to the Communities Secretary and to the Minister of Housing and Planning in March 2016. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of

developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework. Reserve Sites represent land that can be brought forward to respond to changes in circumstances. Additional allocations are necessary as they can be brought forward by a developer and the Councils have more control on bringing forward additional supply. They have less control, if any, in bringing forward windfall sites to meet a shortfall. The conclusions reflect precisely the concerns that we have in respect of the draft Plan. There is insufficient flexibility to deal with changing circumstances, specifically a failure to deliver housing at the anticipated rates. Anything more than 1.8% slippage from the allocated sites, many of which have been carried forward and not delivered to date, would result in the housing requirement not being met. This would have serious implications in terms of the failure to meet identified housing need.

We consider that a much higher flexibility allowance is required, in the order of 20% as advised in the Local Plans Expert Group. This would give a reasonable degree of security that should sites not deliver at the rates anticipated, a 5 year housing land supply could still be maintained.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14221
<b>Person ID</b>	1270581
<b>Full Name</b>	MR & MRS DUNCAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS14237
<b>Person ID</b>	1264711
<b>Full Name</b>	Timothy Symington
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The Green Belt sites around Tring and Berkhamsted, together with the huge northwards expansion of Hemel Hempstead towards Water End are the wrong places to build. If selected these sites will destroy for ever the character of these towns and the countryside surrounding them. Whole villages like Picotts End will be effectively swallowed up by Hemel's expansion. Similarly Great Gaddesden, currently a rural parish, loses a large chunk of its current territory to Hemel's expansion onto Green Belt sites.</p> <p>However, for the reasons given in my answer to questions 1 and 2, the result will be little or no impact on the problem of housing affordability but will have a devastating impact on sustainability.</p> <p>The Plan does not explain why more urban sites have not been included - sites that could be far more sustainably developed and at the same time designated for social housing.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14248
<b>Person ID</b>	1152075
<b>Full Name</b>	Rob Wakely
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

\* No

**The Housing Delivery Strategy comment**

The housing strategy should reflect my vision given in question 1.

**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**

**Title** The Housing Strategy

**ID** EGS14267

**Person ID** 1270624

**Full Name** ROD MACGILLIVRAY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

- I understand that Dacorum is now required to utilise a target of 1,023 dwellings per annum (dpa). This is a further increase from the stated target in the draft Local Plan of 922 dpa (p10: item 38).
- However, what emerges is that neither of these figures is scientifically supported. I understand that the ONS projections made in 2018 showed a need of 355 dpa. After adjustment using the Ministry of Housing, Communities and Local Government (MHCLG) standard method 'algorithm' this figure was adjusted to 922 dpa.

- I understand that in December 2020 this approach was dropped by government in favour of returning to the previous algorithm applied by MHCLG, inter alia, because “...in some places the numbers proposed by the standard method pose a risk to protected areas and Green Belt.”
- Counterintuitively however, the 2014 ONS data – which is clearly out of date – has now been applied to project an adjusted figure of 1,023 This projection of housing need is clearly scientifically unsafe as it is not based on the most recent 2018 ONS data. Basing a Local Plan which will have far-reaching consequences for all in Dacorum on this projection is therefore fundamentally unsound.
- The Local Plan presents the argument that this higher target cannot be met without a large intrusion into the Green Belt, which runs counter to the government’s justification for changing the approach in December 2020. It is illogical to speak about protecting the Green Belt in one breath and in the next breath impose an unscientific target which apparently cannot be met without wiping out a vast swathe of the Green
- The result of the government’s approach is that Hertfordshire’s housing need target increases (by some 19%) while the targets of all other Home Counties decrease. This will clearly further increase the commuter-belt pressures on this part of Hertfordshire in housing the south-east’s growing See further comments regarding infrastructure below.
- Dacorum Borough Council must therefore challenge the housing target presented to them given that it is subjective, scientifically unsound, would lead to unnecessary development on land that should be protected for generations to come, is patently wrong when compared with targets of other Home Counties, and is simply cannot be supported by current nor planned infrastructure in this *On the evidence presented in the document, the scale of development proposed in the draft Local Plan is not justified.*

**Included files**

**Title** The Housing Strategy

**ID** EGS14279

**Person ID** 1270629

**Full Name** Rob Bray

**Organisation Details** 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>The Housing Delivery Strategy comment</b>	(7) Housing Strategy is a crucial section. It gives more detail of where homes are to be located. We have serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14305
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.  Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14321

<b>Person ID</b>	1270637
<b>Full Name</b>	TOM GROVES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Too many houses proposed.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14348
<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>The Housing Delivery Strategy comment</b>	<p>DCB have accepted a huge housing target (unjustifiably) but having done so it has just looked at the map for places to put them. The impact on Tring in particular is enormous. DCB underestimates windfalls ignoring even Government estimates of the effect of the pandemic. Realistic assessment of the windfalls (as shown by BRAG) vastly reduces the need for encroachment into the Green Belt.</p> <p>DCB should release all of the land in HH01 and HH02 now in alignment with the Core Strategy 2013.</p> <p>Why should this be deferred until 2023? What is the reason?</p>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14358
<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> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I see insufficient evidence that the Local Plan fully exploits:</p> <ol style="list-style-type: none"> <li>1 brownfield sites, such as the gas works and office sites released by Covid <ol style="list-style-type: none"> <li>1 Hemel town centre growing upwards to take advantage of building additional storeys being part of permitted development</li> <li>2 windfall (ie sites becoming unexpectedly available) which have historically been much higher than allowed for in the Local Plan</li> </ol> </li> </ol>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14394
<b>Person ID</b>	869011
<b>Full Name</b>	Mr John Savage
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Housing Delivery Strategy comment</b>	<p>The 2700 houses proposed for Tring is excessive and disproportionate as it would increase Tring's population by some 55%, and severely jeopardise the character of the town, which is valued by so many of its residents.</p> <p>The narrow roads in the town centre cannot take more traffic and the car parks are already over subscribed at busy times on Fridays and Saturdays.</p> <p>The station car park (pre-Covid) was also over subscribed, with no scope to enlarge due to being in the Chilterns AONB.</p> <p>The Government has announced, since this consultation was launched, a shift in housing policy to target housing growth in large cities (eg Birmingham, Stoke-on-Trent and Hull) rather than green belt land in the shires.</p> <p>The proposals for Tring should therefore be scaled back with TR03 removed from the Plan (see Question 5).</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14416
<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>The Housing Delivery Strategy comment</b>	<p>LCR and NR support the specific reference to Hemel Hempstead, and in particular the Two Waters area, as being a suitable location for an increase in height and densities, '<i>with an active focus on tall and taller buildings</i>' within draft Policy SP4 (Delivering the Housing Strategy).</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14433
<b>Person ID</b>	1270664
<b>Full Name</b>	ASHLEY COLLINS
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14456
<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>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14464
<b>Person ID</b>	1270669

<b>Full Name</b>	Taylor Wimpey Taylor Wimpey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>• The importance of delivering new homes has been clearly recognised by However, we consider that while the Emerging Strategy has taken a positive approach in planning for the delivery of new homes across the Borough, the strategy has not correctly identified the level of housing growth required. Policy SP4 (Housing Strategy) identifies a minimum growth requirement of 16,956 homes across the Borough over the period 2020-2038. Paragraph 7.5 of the supporting text confirms this is based on a local housing need requirement of 922 dwellings per annum (dpa) as proposed by the Government's consultation on the Standard Methodology for calculating housing need (August 2020)<sup>1</sup></li> <li>• However, the Government confirmed on 16th December 2020 that the Standard Methodology for calculating housing need would revert to the 2018 calculation (except for the 20 most-populated cities and urban areas where a further 35% uplift would be applied).<sup>2</sup>The Council's Housing Topic Paper (November 2020) correctly identifies that the local housing need figure under the 2018 Standard Method would be 1,023 dpa, rather than 922 dpa, equating to a shortfall of approximately 1,458 homes over the plan period against Policy SP4 as currently drafted in the consultation</li> <li>• The Council acknowledges in the Housing Topic Paper the uncertainties over using the August 2020 proposed Standard Method, and the need for 'refinement' should circumstances change. Circumstances have clearly changed following publication of the consultation document, and the local housing need figure should be revised upwards accordingly to ensure the Local Plan is positively prepared as required by Paragraph 35 of the National Planning Policy Framework (NPPF, 2019).</li> <li>• Accordingly, it will be necessary to optimise the sites proposed for allocation, whilst maintaining good design and placemaking principles. It will also likely be necessary to allocate additional sites through the emerging Local Plan to address the above identified shortfalls against housing requirements.</li> </ul>
<b>Included files</b>	

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14481
<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>The Housing Delivery Strategy comment</b>	<p>Policy SP4 – Delivering the Housing Strategy 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 1 and should be an additional figure to reflect that those needs are in addition to the market and affordable homes part of 1.</p> <p>The provision of homes for older persons and care is a key factor and needs to have greater emphasis placed upon it in Policy SP4. As drafted, it is mentioned more as an afterthought at bullet 2. Instead the Policy should include a standalone requirement for the Housing Strategy to meet these needs and identify what the minimum target is, based upon the evidence base, rather than leaving this to Policy DM9 as it is an overall strategic requirement.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14489
<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>	Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>There are relevant issues which form part of the material considerations for considering the proposed delivery of the housing requirement and the effectiveness of the emerging strategy. Due to past delays in plan-making (and implementing the Core Strategy and Allocations Plan), we wish to emphasise the particular need for effective and deliverable allocations that can be implemented in the early or mid-part of this Plan. Our site at Caddington Hall, Luton Road, Markyate, comprises such a site and could come forward within that timescale and contribute to the housing figures required.</p> <p>While it is appreciated that the predominant focus of development around the larger settlements, the utilisation of PDL elsewhere in the borough should also be taken into consideration.</p> <p>In Section 1b of draft Policy SP4, the use of ‘previously developed land’ is encouraged as part of the housing strategy, but this only focuses on the urban areas of the Borough. However, the strategy should seek to utilise previously developed land throughout the Borough, even if in a rural area. This is important as this will contribute to reducing the amount of greenfield sites that are likely to be utilised for development and significantly, will bring back into sustainable and viable uses brownfield sites which are currently being underutilised and with careful design are suitable for re-development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14496
<b>Person ID</b>	1173484
<b>Full Name</b>	Crest Nicholson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>The most recent analysis of housing need within DBC is set out within the draft Local Plan (para. 5), which has progressed the Boroughs housing strategy on the basis of the Government’s proposed revised standard method for local housing need (set out in the recent consultation on the Planning Reform White Paper – Planning for the Future (August 2020)).</li> <li>This sets out that DBC has a housing need of 922 homes per annum (16,596 homes over the proposed plan period of 2020 to DBC has given itself a buffer of just over 300 dwellings, resulting in a total housing supply of 16,899.).</li> </ul>

- Appropriately DBC acknowledge that there are uncertainties over using the revised methodology housing figures and that it will keep the issue under review as it progresses to the next stage of the
- Since the publication of the draft Local Plan for consultation in November 2020, the Government clarified on the 16th December 2020, in its response to the consultation on the White Paper, that aside from the 20 largest urban areas, the standard method for local housing need will remain that which was first introduced in 2017. As Dacorum falls outside of the 20 largest urban areas, the standard method for the Borough will remain as it was in 2017. This results in a figure of 1,023 dwellings per annum, an increase of 10% over the (August 2020) revised
- In light of this, it is clear that the housing need figures for Dacorum will increase prior to adoption of the plan. The draft Local Plan recognises (paragraph 1.48) that its content will need to be kept under review in the light of any changes to legislation and / or Government guidance arising following the Planning White Paper consultation and the December 2020 announcement constitutes such a
- The draft Local Plan also recognises (paragraph 7.5) that *“there are uncertainties over using this as our housing figure... and [will] make any necessary adjustments when we know ”*
- The Government’s December 2020 announcement was subsequently incorporated into the updated Planning Practice Guidance (PPG).
- Whilst the draft Local Plan is predicated on the (then) most up to date information, the Governments subsequent announcement has shown that the national level of housing requirement is not reducing, indeed on this basis subsequent iterations of the emerging Local Plan will need to reflect this growth in housing
- Furthermore any future changes are unlikely to significantly reduce the required level of housing in Dacorum. Given the levels of housing requirement, it is therefore clear that there is a need to rely on the release of certain Green Belt sites in order to meet this increasing need, and this is recognised within the draft Local Plan (paragraph 11).
- The draft Local Plan sets out that Hemel Hempstead will accommodate almost 65% of DBC’s forecast housing supply, as the main urban residential location in the borough. To compliment this, the need still exists to increase the housing supply within the next largest growth areas, e. Berkhamsted and Tring, identified in the draft Local Plan as Market Towns and proposed to supply 2,236 and 2,731 homes within the Plan period, respectively. Given that Berkhamsted is the second largest settlement in Dacorum and considering its resident population, it is considered that it has the potential to accommodate a higher proportion of DBC’s final housing supply figure.

**Included files**

**Title** The Housing Strategy

**ID** EGS14523

**Person ID** 1270690

**Full Name** Akzo Nobel CIF Nominees Ltd

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	In respect to the Council's housing strategy (Policy SP4), it is recognised the new Local Plan seeks to deliver a minimum 16,596 dwellings between 2020-2038, equivalent to 922 dpa. However, this figure will need to be increased to reflect the Government's new Standard Method and a minimum OAN of 1,023 dpa, equating to 18,414 dwellings between 2020-2038 (increase of 1,818 homes). This will ensure the housing strategy and Local Plan is "positively prepared", a key soundness test in accordance with paragraph 35 of the NPPF.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14541
<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>The Housing Delivery Strategy comment</b>	Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.  Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14560

<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>The Housing Delivery Strategy comment</b>	Figure 2 on page 38 of the Strategy showing the Housing Trajectory 2020-2038 shows a reckless disregard for the reality of the arrival of new water sources in the Borough area, with the highest levels of growth planned for the middle of the Strategy period, before new water sources, in the most optimistic projections, will be expected to be available. The Environment Agency assesses that the whole of the south and east of England currently suffers from water stress, meaning that no new water (by means of transfers within the region) would be available as a short-term fix.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14569
<b>Person ID</b>	1270700
<b>Full Name</b>	Mr Peter Sims
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>The fact that dacorum "cannot meet it's growth needs" with out building on the greenbelt is not an exceptional circumstance. The only exceptail circumstance is the climate emergancy. The whole point of the "Greenbelt" around london was to constraint development (and therefore growth) to force it to occur else where in the country. It</li> </ul>

therefore entirely defeats the point of having a "greenbelt" if it doesn't constrain growth. I come back to the question I raise in response to the objectives — Do we want dacorum to eventually become a city? (or part of 'event greater london'?) If the greenbelt isn't going to constrain development, like it's support to, what is ?

**Included files**

**Title** The Housing Strategy

**ID** EGS14572

**Person ID** 1270700

**Full Name** Mr Peter Sims

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

There are various carpark in dacorum (and some retail parks) that aren't going to be needed/compatible with a zero carbon dacorum (as people will need to shift to walking/cycling/taking public transport to local shops). These would seem to be first option for where new industrail and housing should be built.

Evidence of Modal shift in transport required:

<https://cat.org.uk/info-resources/zero-carbon-britain/research-reports/>

[https://greenhouse.chiltern.org.uk/regional\\_reports/Region\\_Climate\\_Jobs\\_Summary\\_v2019a\\_UKH23.pdf](https://greenhouse.chiltern.org.uk/regional_reports/Region_Climate_Jobs_Summary_v2019a_UKH23.pdf)

**Included files**

**Title** The Housing Strategy

**ID** EGS14578

**Person ID** 1270702

**Full Name** TESCO PENSION INVESTMENT FUND MANAG

**Organisation Details** C/O Savills

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	Policy SP4  TPIFM strongly supports the delivery of new housing through the redevelopment of previously developed land, vacant or underused sites within the urban areas of the Boroughs as proposed by draft Policy SP4 of the Sustainable Development Strategy.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14582
<b>Person ID</b>	1270702
<b>Full Name</b>	TESCO PENSION INVESTMENT FUND MANAG
<b>Organisation Details</b>	C/O Savills
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	TPIFM also strongly supports the delivery of new housing through the redevelopment of previously developed land, vacant or underused sites within the urban areas of the Boroughs as proposed by draft Policy SP4 of the Sustainable Development Strategy.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS14598
<b>Person ID</b>	1270709
<b>Full Name</b>	Mr Rodney Tucker
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy 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</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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS14605
<b>Person ID</b>	1270714
<b>Full Name</b>	Mr Kevin kelly
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy 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</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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS14612
<b>Person ID</b>	1270715
<b>Full Name</b>	Sunil Tandon
<b>Organisation Details</b>	The Park Garage Group PLC
<b>Agent ID</b>	1264313
<b>Agent Name</b>	James Hodgkins
<b>Agent Organisation</b>	Simply Planning Ltd
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>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.</p> <p>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.</p> <p>In particular, it is our clients 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.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14618
<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>	Yes

- \* Yes
- \* No

**The Housing Delivery Strategy comment**

Paragraph 7.5 of the Dacorum Emerging Strategy for Growth (2020 - 2038) (the ‘consultation document’) states: “...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.”

Our clients welcome the commitment to update and refine the Local Plan housing target in line with new guidance and as new factors emerge. Since publication of Dacorum Borough Council’s (‘DBC’) consultation document (November 2020), the Ministry for Housing, Communities and Local Government (MHCLG) published consultation feedback and proposals in response to their earlier consultation Changes to the current planning system (16/12/2020)<sup>1</sup>. On the same day MHCLG updated key sections of the Planning Practice Guidance (PPG), namely the addition of new paragraphs 033 to 039; and amended paragraphs 004, 010 and 013 of the Housing and economic needs assessment<sup>2</sup> section. The most notable changes centred on the proposal to deliver more homes on brownfield land with a 35 per cent uplift applied to the post-cap number generated by the standard method to Greater London and to the local authorities which contain the largest proportion of the other 19 most populated cities and urban centres in England. Related to this MHCLG confirmed that the 2014-based household projections would be used as a key input into the standard method: “The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections.”

DBC’s consultation document utilised the 922dpa figure produced by MHCLG’s now dropped ‘mutant algorithm’ (as it was characterised in the national press). The changes to the PPG introduced on the 16th December 2020 mean that DBC must now use the figure of 1,023dpa as the minimum local housing need starting point. This would result in a minimum of 18,414 homes required over the plan period. Factoring in commitments (as of April 2020), Urban Growth Areas, Grovehill Neighbourhood Plan and a Windfall allowance would result in a revised deficit housing need figure of 7,460 (18,414 - 10,954). This represents an increase of at least 1,818 dwellings over the plan period. This is a sizeable increase to the local housing need starting point and must be considered in the context of average annual completions and recent Housing Delivery Test performance. The Housing: Policy Background Topic Paper (DBC, November 2020), at Table 4.1, includes a Summary of (net) housing completions 2006-19. This confirms an average (between 2014-19) of 569dpa. DBC will be required to support the doubling of annual delivery rates in the new Local Plan. Related to this, DBC scored 89% in the latest (2020) Housing Delivery Test results (published on 19th January 2021) and as a consequence will be required to produce an Action Plan. With the number of homes required post 2019/20 set to stay at an elevated level (based on the standard method) it is conceivable that prior to submission of the new Local Plan DBC may be required to find a 20% buffer of sites.

The NPPF (at paragraph 73 and footnote 39) requires Local Plans to include a buffer (to the supply of specific deliverable sites), with a minimum of a 5% buffer to ensure choice and competition in the market for land; or 10% where the local

planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan (to account for any fluctuations in the market during that year). Based upon DBC's increased local housing need minimum

starting point, it is possible that a 20% buffer may be necessary/desirable (to help improve the prospect of achieving the planned supply), if significant under delivery of housing is evident prior to submission. Recent examinations in public and adopted plans have shown the benefits of identifying a buffer of sites over and above the local housing need minimum starting point including for locations with high annual delivery rates (see East Hertfordshire and Milton Keynes). Our clients landholdings would be capable of contributing to the housing land supply deficit and represent a sustainable location without loading even more growth into the largest DBC settlements. The allocation of our client's sites would make the Local Plan less reliant on 'windfall' sites and less sustainable 'Small Villages within the Rural Area' and 'Other small villages and the countryside'.

**Included files**

**Title** The Housing Strategy

**ID** EGS14656

**Person ID** 1270735

**Full Name** KEITH AND LESLEY BAKER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

We strongly object to the above Plan on the following grounds:

- The Proposal is to increase the amount of housing in Tring by 2,700 houses, a 55% Further, with reference to Page 16 "Key Developments in Tring" of the Dacorum Local Plan booklet distributed to households, it looks like the footprint of the Town is nearly to double. No Town could absorb this degree of expansion and still retain its character or for its Services to be able to cope with the extra demand that that extra housing places upon it.
- Looking at the Maps of the 'Satellite Towns' to Hemel Hempstead - Berkhamsted, Tring, Kings Langley, Bovington, and Markyate, it is evident that Tring is the only one with this degree of unacceptable expansion.

- The expansion shown on the north-east of the Town between the Bulbourne Road and Station Road (Areas Tr02 and Tr03) is particularly egregious for the following reasons:

- 1 It is a development in the Green Belt which causes unacceptable harm and no exceptional circumstances have been given why this land should be
    - 1 It is in an Area of Outstanding Natural Beauty lying as it does at the base of the Chiltern Downs. It is also home to abundant wildlife species including
  - 2 It accounts for a large part of the unacceptably high increase in the housing
- The Planners fail to recognise two very important points:
    - 1 First the Government have quite rightly decided that the numbers behind this National Plan, of which this Plan forms part of, no longer makes sense. It was based on a discredited algorithm which put too much emphasis on expanding housing in the South-east and not on the regional 'evening-up' policy endorsed by the
- 1 Up until the outbreak of Covid 19, one could fairly say that Tring was largely a Commuter Town with 1000 plus cars parked daily at Tring Station. A development that placed more houses near to the Station might have claimed some justification. Times have changed quite radically with the best estimates we have suggesting that clerical workers are likely to visit an office perhaps two

times a week. In future, that office might no longer be in Central London but

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locally in Dacorum and the house no longer needs to be close to a commuter station. This Planned development looks increasingly like yesterday's plan.

For all of the above reasons, we strongly object to the Plan in its current form

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14662
<b>Person ID</b>	860814
<b>Full Name</b>	Mrs Clare Joyce
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Section 5.5 / 5.6. It is recognised that Markyate, Bovingdon and Kings Langley do not have the appropriate infrastructure and therefore see only modest levels of growth, yet Tring sees substantial growth yet the impact of the infrastructure required has not been assessed? A full assessment of infrastructure must take place; some infrastructure in Tring are already struggling with the current population.</p> <p>Tring is situated on the Tring Salient; it is surrounded by the county of Buckinghamshire! Whilst consideration has been given to neighbouring Hertfordshire boroughs (all some distance away from Tring), Bucks CC should be consulted about their vision and plans for the surrounding towns and villages and so the impact this would have on Tring can be assessed. For example: a planning application has been considered near Aston Clinton (Hampden Fields) which will provide 2-3000 new homes, 9 ha employment site and infrastructure. This is only 2-3 miles down the road and therefore not only should it be considered in the local provision for housing and employment but also what long term impact such a development would have on house prices and employment opportunities. (e.g. Tring may be seen as more desirable, subsequently push house prices up and therefore put housing out of the reach of local people.)</p> <p>Section 8.23. With Tring's proximity to neighbouring Aylesbury and Wendover has the impact of the growth of their employment sites on Tring been assessed? Pitstone already has a large employment site which also has a site ready for expansion. Has this been explored as this seems to be the most obvious place for industrial development. See also comment above about Hampden Fields employment area.</p> <p>Section 9.14. Brook Street is totally inappropriate for retail development due to its historic buildings and market square, museum and the street itself already suffering from heavy traffic congestion at certain periods during the day. Tring High Street is also inappropriate for retail development due to the unique nature of the High Street e.g. independent shops, cafes and restaurants.</p> <p>Bill Grimsey is the author of several national reviews of the traditional high street and in every one has urged a move away from retail so the vision for Tring High Street seems very outdated and we should instead be thinking what the High Street will deliver in mid 21st century.</p>

To quote Nigel Cooke (Stockton upon Tees cabinet minister for regeneration:) "The future [of the high street] is not more shops. It's about leisure, culture, events and recreation and making it a nice place for people to simply be."

**Included files**

**Title** The Housing Strategy

**ID** EGS14674

**Person ID** 1270738

**Full Name** JOHN BELL

**Organisation Details** SECRETARY

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

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 The revised Local Plan must recognise 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

**Included files**

**Title** The Housing Strategy

**ID** EGS14680

**Person ID** 1270739

**Full Name** HELEN OSBORNE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.

It is not clear as to whether the " windfall" calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.

**Included files**

**Title** The Housing Strategy

**ID** EGS14683

**Person ID** 1270739

**Full Name** HELEN OSBORNE

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14690
<b>Person ID</b>	1270740
<b>Full Name</b>	JOHN 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>The Housing Delivery Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the " windfall" calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14693
<b>Person ID</b>	1270740
<b>Full Name</b>	JOHN 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>The Housing Delivery Strategy comment</b>	<p>Given the substantial shortfall in the evidence provided to justify the current housing supply target and housing strategy I do not propose there to be any other sites that should be included in the plan.</p> <p>Once the Council conduct a review of the evidence of 'housing need' and bring forward a Plan meeting the requirements of exceptional circumstances to build on the green belt then I would be prepared to consider other sites for development.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14725
<b>Person ID</b>	1259966
<b>Full Name</b>	Trevor Sawyer
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

## The Housing Delivery Strategy comment

So why has Tring been singled out for massive over development, which includes a disproportionate Green Belt release, when compared with ALL other towns in Dacorum? is it because we have outstanding facilities compared with the others? No. Is it because we have better communications than the others with more than 5,000 population? No. is it because we have better shopping? No. is it because we are out on a limb, about as far as you can get in the Borough and County from the seats of power? Probably: there are many examples around the country where local authorities 'dump' their major housing numbers as far from their key locations as possible.

The facts are this, expressed as a percentage of the existing population Tring is expected to absorb an additional (assuming The local UK National Census Data of an average 2.5 persons per household) - 57% population, 46% on Green Belt land alone. The numbers for the other locations in the report are: Berkhamsted 25% and 20% respectively: Hemel 27% and 3.9%: Kings Langley 13.7% and 7.25%: Bovington 12% and 7.5%: Markyate 16.7% and 12%. I ask again, why is Tring being singled out for this excessive over-development? It can only be because of our location at the far extreme of the Dacorum. More than double the population growth of the others (2.3X Berkhamsted and 2.1X Hemel) and 11.5X that on Green Belt in Hemel

The production levels proposed in the earlier 'full' Dacorum Planners report proposals {that seem to have now been cast in tablets of stone, despite being labelled for consultation) propose the annual rate of housebuilding to be as follows: 2025/6 90 completions from 2 major releases sites: 26/7 120 from 2 sites: 27/8 170 from 3: 28/9 220 from 3: 29/30 245 from 3: 30/1 240 from 3: 31/2 310 from 3: 32/3 200 from 2: 33/4 175 from 1: 34/5 175 from 1: 35/6 125 from 1: 36/7 125 from 1: 37/8 100 from 1.

Therefore, for 8 years from 2026, we will have major construction works in 2/3 different locations around Tring with all the safety issues that come with heavy transport rattling around our narrow roads, potentially 100's of 'imported' construction workers arriving by car every day, and the inevitable road closures required for service works: what a prospect for our quiet, historic Market Town. Should our school-children and the more mature amongst us who may have mobility issues, be subjected to this level of disruption for such a long period? There are clearly safety issues around so much additional traffic and the associated pollution **that** comes with it.

The plan process started in 2017 and is 'flagged' as a 'consultation document for this year 2021. However, looking through this report, many hundreds of pages long, there are key elements/stats (some already noted above) that suggest that this is not for consulting, but a decision document that is just waiting a formal 'nod' from the politicians. Much of this report is cut & paste waffle from other National documents: there is a dearth of real local consideration. There are also in my view, a number of out-of-date assumptions and inaccuracies in the core information, as well as conflicting statements about conserving the character of the area, its' status as an AONB (Area of Outstanding Natural Beauty) and preserving the views from and to the Chilterns at the same time as commissioning mass destruction of all of the above and Green Belt land by bulldozer.

Given that the national population growth numbers were downgraded in 2018, has this been taken into consideration? Further, have the inevitable reductions in population growth due to Brexit and Covid also played a part: will we need so

many new homes in the future? Also a Brexit factor is that we should be preserving our precious high quality farming land for food production, not concreting over it. As announced late last year, Central Government are to review the amount of development in the countryside, meaning that the current proposals should be at best reviewed and held 'till there are clearer policy decisions.

Another inaccuracy in the report assumptions is affordability. It suggests that there is close to a +50% difference in house prices between Berkhamsted and Tring, suggesting that Tring is a much more affordable area. Berkhamsted has many more larger homes than does Tring, therefore distorting the average house prices upwards. The true comparison, based on the proposed 'mix' of house sizes for the developments means that a true comparison would be for the traditional 3 bed semi/terraced, which shows that the price of these properties in both towns are far closer, in some instances equal. So, if the reason for putting so many new homes in Tring is one of affordability, it is a totally false argument.

Given that there may be a case for additional housing in Tring, why does there have to be so much destruction of Green Belt land, given that we are on the edge of the Chiltern's and an AONB. This is particularly true of Dunsley Farm which is an active dairy operation that has been around for many, many years. This land is 'lightly' used and is therefore an important resource for wildlife. It is not 'intensively' farmed, unlikely to be contaminated by chemicals and to my personal knowledge, not ploughed for at least two decades, probably much longer. It also has a very well established layout of fields, with equally well established boundary hedges. These again are only lightly maintained and therefore, very important to wildlife, as we see and hear on a regular basis: in fact at dusk we have seen bats flying between roosts. Research of ancient maps, indicate that the field layout for Dunsley, looks the same/similar to that of 200 years ago and probably longer, so it is very much part of the Towns' history and heritage.

Unlike the other proposed sites, there is ready public access to the land via a footpath in use every day and often all day. The other sites seem to have/had more intensive arable uses and without so much divisional hedging, therefore unlikely to have the same wildlife/amenity value as Dunsley. Its' aesthetic amenity value also extends way beyond the existing boundaries: it is next to the main entrance to our historic Market Town and in many ways establishes the whole definition of Tring as a place to live: a country Market Town, not an urbanised extension to Heme! or Aylesbury. This is what we and our visitors see as the first impression of Tring, nestling on the edge of the Chilterns an area of AONB. To develop Dunsley would have a significant visual and amenity impact not only on the Town, but as it is viewed from much further afield. So why is Dunsley Farm being promoted as a development site when there is so much against it? Simple, it is the 'soft option': being owned by Herts County Council, they have the ability as owners to promote it through the planning process and effectively grant themselves planning permission. But, being the easy option, does not make it the right one. If we accept that there needs to be housing in Tring on Green Belt land (which I believe much of the current population don't) starting with one larger site, say Station Road/Grove Farm, would provide a complete town edge settlement, provide the housing numbers so much desired by the Herts/Dacorum and reduce the disruptive impact on the Town and the visual impact from the approach to Tring and from further afield.

Traffic pollution to both homes and schools from the A41 would be nil (unlike Dunsley) and it would provide valuable time to re-assess the demand for homes following the disruption of Covid and Brexit on the population statistics. Even central Government has seen the error of forcing the destruction of much loved Green Belt land, in our already crowded country, so why are Dacorum and Herts continuing to press this very unpopular measure? Is this just another unimaginative

'formulaic' approach by the planners to squeeze new developments in between the Town and by-pass - see the similar proposals for Berkhamsted too.

The development of Ounsley Farm will change Tring forever and have a far greater negative impact than anything that has taken place since the Market Charter was granted 700 years ago. Either stop this 'soft option' by Herts CC now, or at least delay it until there is better long term information available.

**Included files**

**Title** The Housing Strategy

**ID** EGS14732

**Person ID** 1207558

**Full Name** Ms Jane Barnett

**Organisation Details** Director  
Savills (on behalf of Taylor Wimpey)

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment** *1. The Plan will deliver a minimum of **18,414** ~~16,596~~ net additional homes across the Borough over the period 2020-2038.*

*Table 2 (Sources of Housing Land Supply) will also need to be updated to align with the above and reflect revised numbers in seeking to support its delivery.*

**Included files**

**Title** The Housing Strategy

**ID** EGS14733

**Person ID** 1207558

**Full Name** Ms Jane Barnett

**Organisation Details** 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>The Housing Delivery Strategy comment</b>	<p>.As detailed in Sections 2 and 3 of the Planning Response, 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. 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 LHNA. Further commentary on this provided at Section 4 of Savills' Planning Document (February 2021) and should be reflected in Table 2 when setting out revised supply figures. This 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>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14745
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>4.4 The housing strategy for the Plan is set out in Section 7 of the Plan and is predicated on the 922 dwellings per annum figure. As set out above, the figure should be uplifted to reflect the standard method of 1,023 dwellings.</p> <p>4.5 The overall approach of concentrating housing growth at the existing urban areas of Hemel Hempstead, Berkhamstead and Tring along with the three larger villages is supported. The draft policy sets out that this will be delivered in accordance with the delivery strategies set out in Section 23 of the Plan. Section (k) sets out that Tring will deliver up to 2,200 homes through a series of strategic urban extensions. This draft policy could helpfully cross-refer to the delivery strategy which sets out the specific allocations to deliver this (Tr01, Tr02 and Tr03). It is also noted that draft Policy SP23 (Delivering Growth in Tring) sets out that the urban extensions will deliver 'around' a specified number of dwellings. Draft Policy SP4 should also reflect this and state that Tring will deliver around 2,200 new homes through a series of strategic urban extensions.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14804
<b>Person ID</b>	1264510
<b>Full Name</b>	Martin Evening
<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>The Housing Delivery Strategy comment</b>	<p>2. I object to the housing numbers that have been proposed in this consultation. The government must be challenged on the numbers put forward.</p> <p>Why are outdate ONS figures of 730 dwellings being used, when applying the algorithm increases it to 1023 dwellings per year?</p> <p>Clearly these are out of date figures. The latest ONS projections for Dacorum is 355 houses per year. Applying the algorithm to this latest number, this would suggest that the maximum figure for our housing target should be 497 dwellings a year.</p>

This inflated target is in large part responsible for the huge amount of Green Belt that is put forward to be released for housing as part of this Local Plan and will provide an overprovision of housing in the area. The current proposed plan promotes building nearly 17,000 new homes within our borough of which 60% is Green Belt, meaning the houses will be built right up to the boundaries of the Chilterns AOB. This will have significant impact on the special biodiversity we have in Dacorum.

The Council has failed to take account of the National Planning Policy Framework, paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constraints including the impacts on the Green Belt and AONB.

**Included files**

**Title** The Housing Strategy

**ID** EGS14814

**Person ID** 1270802

**Full Name** Mr Edward Blogg

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment**

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.

**Included files**

**Title** The Housing Strategy

<b>ID</b>	EGS14837
<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>The Housing Delivery Strategy comment</b>	<p>The Housing Strategy- paragraph 7.2 - We note that national policy expects planning authorities to maintain a supply of sites which are "deliverable" and "developable". We contend that the site which we feel should be brought into the plan, is certainly "developable" and could easily be made "deliverable".</p> <p>Paragraph 7.11 - We acknowledge and support the release of land from the Green Belt to meet housing targets.</p> <p>Contingency/Flexibility - Our clients have been involved with the very long process associated with bringing site HH21 through the planning process. This has made them aware of the long lead in times associated with delivering housing at the scale of 1150 dwellings and the consequent need to allocate smaller sites, which can come forward more quickly, to meet the immediate housing need.</p> <p>At paragraph 7.21 the plan acknowledges that the area to the north of Hemel Hempstead is part of a large and comprehensive development, extending to the east of the town, into St Albans City and District. It acknowledges that this allocation needs to be infrastructure led and experience suggests that such schemes can take many years to deliver. We would therefore support the need for a number of small to medium sized sites, as set out in paragraph 7.22 and we would urge the authority to add Land off Fields End Lane to these allocations.</p> <p>SP4 - Delivering the Housing Strategy - In order to create a robust plan with sufficient flexibility, we would urge the addition of our clients' land in accordance with paragraph 1 (e) and urge caution in connection with paragraph 1 (i), in terms of the long lead in times associated with strategic urban extensions.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14885

<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>The Housing Delivery Strategy comment</b>	Policy SP4 is based on the assumption that the calculated housing need predominates over other considerations in the NPPF. As noted above, this is not correct. As elsewhere in the plan, insufficient recognition is given to the separate character of Northchurch as a village which is separate from Berkhamsted. Developments to the South-West of Berkhamsted will undermine that separation.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS14924
<b>Person ID</b>	1270586
<b>Full Name</b>	RACHEL CHAPMAN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I wish to place on record my whole hearted objection to the amount of housing Dacorum Council and the UK Government is placing on Berkhamsted and Tring.</p> <p>My husband and I have been living in Berkhamsted for over 40 years and have loved living in this historic and ancient town surrounded by marvellous countryside and within the Chilterns Area of Outstanding Natural Beauty. The amount</p>

of housing Dacorum Council is planning for both Berkhamsted and Tring will ruin both towns and blight the lives of our local community.

**GREEN BELT** land - even the Government has said that Green Belt land should not be developed except in exceptional circumstances. As I understand it Berkhamsted and Tring in the recent past have exceeded the housing numbers required, whereas Hemel Hempstead has not.

Green Belt land should not be used for housing under any circumstances, it protects the boundaries of the various towns and villages and also in the case of Berkhamsted and Tring valuable farming land is going to be used. Surely as a country we should be self sufficient as much as we can be in food production, particularly as we are longer in the EU,

- and riot put up houses instead. We can't eat bricks and mortar.

During the pandemic, our lives have been dramatically changed and I suspect will continue to affect all of us for many, many years to come. People are mostly working from home, offices are now empty and the likelihood that we will return to the old way of working is highly improbable, or perhaps to much lesser degree. We mostly shop on line and shops are empty and shut, retail companies have gone into bankruptcy etc etc. Surely this brown field land can be used for providing homes including affordable ones instead ruining our lovely countryside.

I suspect that builders/building companies are keener to build in Barkhamsted or Tring for a far higher profit margin, instead of say Hemel Hempstead.

**INFRASTRUCTURE** in both Berkhamsted and Tring is a dire way now, let alone with an influx of many, many extra houses with a minimum of 2 cars per household. The lack of parking is not actually noticeable at present due only to the current pandemic and I suspect even with the provision of the multi-storey parking off Kings Road in Berkhamsted, it will not be sufficient (particularly as it only provides a few extra parking spaces than previously) once we return to a near normal life.

Schools and doctors' surgeries are full now. Water supplies, sewerage, electric and gas supplies could be impacted quite seriously, particularly water and sewerage. Roads appear to be in a permanent state of disrepair.

We are supposed to be going green but the bus service is not particularly good. Berkhamsted is in quite a steep valley with narrow streets so in fact buses can not easily travel everywhere. Before the pandemic there were constant traffic

jams in the centre of town, even now during the pandemic we can have traffic jams by the main traffic lights!! What on earth will it be like with 1000s more houses built in the future. The same can be said of Tring.

**PLEASE DO NOT RUIN OUR PRECIOUS AND HISTORIC MARKET TOWNS OF BERKHAMSTED AND TRING.**

**Included files**

**Title** The Housing Strategy

**ID** EGS14928

**Person ID** 1270586

**Full Name** RACHEL CHAPMAN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Housing Delivery Strategy comment** We do need a sensible amount of houses, including most importantly affordable housing but nor do we need the equivalent of rabbit hutches with houses cheek by jowl!!

**Included files**

**Title** The Housing Strategy

**ID** EGS14945

**Person ID** 1270499

**Full Name** Hertfordshire County Council Property

**Organisation Details** Property Team

**Agent ID** 1263792

**Agent Name** Ms  
Claire  
Newbury

<b>Agent Organisation</b>	Senior Associate Vincent and Gorbing
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<b>Housing Supply</b> <b>Policy SP22</b> and <b>Policy DM11</b> indicate that the design and density of development within the Dunsley Farm Growth Area (Tr01) will be determined by a masterplanning exercise, and that the density of development will not be This approach is welcomed by HCC and should ensure that the Dunsley Farm site can deliver the maximum amount of development that is appropriate, and not be constrained by setting maximum density figures at this stage. The Council must encourage innovative design at these sustainable locations in order to meet increased housing need.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15021
<b>Person ID</b>	1270845
<b>Full Name</b>	DOMINIC 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>The Housing Delivery Strategy comment</b>	<b>A common issue with the proposed sites is that development of a good number of them would unavoidably be detrimental to the AONB or its setting.</b>  This contravenes the proposed local plan policy DM27, which states (inter alia) that major development affecting the setting of the AONB will only be granted if such development will conserve and enhance the Chilterns AONB's " <i>special qualities, distinctive character, tranquillity and remoteness</i> ". Policy DM27 is intended to reflect paragraph 172 of the NPPF, which stipulates that " <i>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.</i> "

As already noted, it is clear that the “setting” of the AONB is not to be construed narrowly; any development within eyeshot of part of the AONB (i.e. where there is intervisibility) or which could have some other form of impact on the AONB (e.g. noise or light pollution) can only be countenanced if the development will “*conserve and enhance*” the AONB’s “*special qualities, distinctive character, tranquillity and remoteness*”.

**Included files**

**Title** The Housing Strategy

**ID** EGS15029

**Person ID** 1270846

**Full Name** PETER ATKIN

**Organisation Details** ASSOCIATE

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

**2.0** The importance of delivering new homes has been clearly recognised by Dacorum. However, it is considered that while the Emerging Strategy has taken a positive approach in planning for the delivery of new homes across the Borough, the strategy has not correctly identified the level of housing growth required. Policy SP4 (Housing Strategy) identifies a minimum growth requirement of 16,956 homes across the Borough over the period 2020-2038. Paragraph 7.5 of the supporting text confirms this is based on a local housing need requirement of 922 dwellings per annum (dpa) as proposed by the Government’s consultation on the Standard Methodology for calculating housing need (August 2020)<sup>1</sup>.

**2.1** However, the Government confirmed on 16th December 2020 that the Standard Methodology for calculating housing need would revert to the 2018 calculation (except for the 20 most-populated cities and urban areas where a further 35% uplift would be applied)<sup>2</sup>. The Council’s Housing Topic Paper (November 2020) correctly identifies that the local housing need figure under the 2018 Standard Method would be 1,023 dpa, rather than 922 dpa, equating to a shortfall of approximately 1,458 homes over the plan period against Policy SP4 as currently drafted in the consultation document.

**2.2** The Council acknowledges in the Housing Topic Paper the uncertainties over using the August 2020 proposed Standard Method, and the need for 'refinement' should circumstances change. Circumstances have clearly changed following publication of the consultation document, and the local housing need figure should be revised upwards accordingly to ensure the Local Plan is positively prepared as required by Paragraph 35 of the National Planning Policy Framework (NPPF, 2019).

**2.3** Accordingly, it will be necessary to allocate additional sites through the emerging Local Plan to address the above identified shortfalls against housing requirements and land at Homefield, Bovingdon, is plainly capable of contributing towards the Borough's housing needs in a sustainable manner.

**Included files**

**Title** The Housing Strategy

**ID** EGS15043

**Person ID** 1250021

**Full Name** Hallam Land Management Ltd

**Organisation Details** Hallam Land Management Ltd

**Agent ID** 1265070

**Agent Name** Stacey Rawlings

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment** Increase the buffer to a minimum 5% and identify additional land for at least an additional 530 homes to 2038 above the level currently identified that would provide flexibility to meet the LHN in full.  
Correct Policy SP4 to provide a consistent scale of growth for HGC across all related policies.

**Included files**

**Title** The Housing Strategy

**ID** EGS15057

**Person ID** 1270849

**Full Name** 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> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p><b>The Housing Strategy</b></p> <p>Based on recent guidance, the present DESG housing requirement will result in under provision of housing during the plan period. This is in the context of the recent failure to meet the current, much lower, housing requirement. The most recent Housing Delivery Test results, published in January 2021, indicate that in the last three years, Dacorum has only delivered 89% of its requirement and therefore an action plan is necessary to address this.</p> <p>The DESG sets out a housing need figure of 922 homes per This equates to a total figure of 16,596 over the plan period of 2020-2038. The Local Housing Need (LHN) figure is calculated in accordance with the Government's 2018 Standard Methodology (SM). This figure is reiterated in the South West Herts Local Housing Needs Assessment (September 2020).</p> <p>Central Government consulted on a proposed new SM in August 2020. This was intended to have greater focus on affordability, and removed the 'cap' on housing Dacorum has chosen to adopt this calculation when setting out their LHN in the DESG. However, following public consultation, in December 2020, the Government announced that the SM would remain as the 2018 version, applying 2014-based household projections with a percentage uplift to reflect the price-income affordability of housing, and subject to a 40% cap.</p> <p>Whilst for many authorities, reverting to the 2018 SM represents a decrease in LHN figures, for Dacorum, it actually represents an increase, from the 922 dwellings pa set out in the draft Local Plan, to a figure of 1,023 pa. This would mean an overall total for the plan period of 18,414 Even recognising the slight over provision demonstrated within the housing trajectory (Figure 2) of 280 dwellings, this would mean an uplift in the annual housing provision of 85 additional homes per annum, or 1,538 homes over the plan period. Returning to the 2018 Standard Methodology is the Government's adopted position, it is not to be consulted on, therefore Dacorum will need to adjust the housing figures within the Reg 19 Local Plan to reflect this.</p> <p>Moreover, the final housing requirement in the submission draft should factor in the outcome of Duty to Co-operate discussions, in particular the need to accommodate unmet need from Watford and (particularly) London.</p>

When considering how and where to accommodate this uplift, the Council’s starting point should be to focus on the sustainable towns within Borough, increasing capacity on the brownfield sites in the most sustainable locations that have already been identified within the draft Local Plan, including the National Grid site.

Indeed, it is noted that the plan indicates that to achieve the housing requirement will require fully reviewing opportunities to increase delivery on allocated As highlighted above, for allocations that are previously developed land, all yields should be expressed as minima to enable design-led solutions that could allow yields to be increased to optimise the amount of new homes delivered. This is certainly the case on the National Grid site which, as described above, is likely to have potential to deliver significantly more than “around 400 dwellings” presently indicated in the allocation.

St William object to the reliance on windfalls at 200 homes per annum. At over 2,400 homes over the plan period this represents some 15% of the overall housing supply. The previous supply of windfalls cannot itself be a reliable guide to the future supply and given the site search process and allocations it is considered that a more realistic assessment should be undertaken of the contribution of windfalls in the future that places less reliance on this source.

St William support the approach of the DESG to encouraging development without any imposed phasing, particularly as regards to existing commitments and The Housing Strategy Topic Paper indicates that the delivery of the housing is ‘peaked’ in the middle years of the plan as major growth areas come forward, with less development in the early years of the Plan given its reliance on existing commitments and allocations. Whilst it demonstrates that a 5-year supply can be achieved, there is little flexibility in this regard, with a risk that a deficit could arise in these early years. This will exacerbate the recent under-provision of new homes demonstrated by the most recent Housing Delivery Test results. This reinforces the need to make the best possible use of existing allocations.

Overall, Policy SP2 – Delivering the Housing Strategy – is supported in principle. Again, St William welcome the reference to the need to increase the height and densities of urban sites. The minimum housing requirement will require a step change in delivery and maximising yields from identified sites is crucial to achieving this and ensuring the plan is deliverable.

The housing trajectory in the housing topic paper shows development commencing on the National Grid site in 2022/23. This is a correct assumption.

**Included files**

**Title** The Housing Strategy

**ID** EGS15071

**Person ID** 1158050

**Full Name** Mark Behrendt

**Organisation Details** Planning Manager – Local Plans  
Home Builders Federation

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p><i>Housing needs</i></p> <p>1 The Council recognises in the plan that there was some uncertainty in using the methodology being proposed by the Government in its most recent consultation on the standard This concern has been realised and the Council will need to plan for a higher level of housing than is proposed in its emerging strategy. The latest approach that has been adopted by the Government basically retains the original approach, but uplifts housing needs further in the largest urban areas. Given that Dacorum does not face this urban area uplift the Council will need to plan for a minimum of 1,023 new homes per annum between 2020 and 2038 – a total of 18,414. The Council will also need to take account of any changes in the affordability ratio when the latest data on these ratios is due to be published in March 2021.</p> <p>1 In addition, the Council must recognise that this is the minimum number of homes that they must plan for. Paragraph 60 of the NPPF requires the Council to take account of any unmet needs in neighbouring areas. We note that the Council are working with their neighbours in South West Hertfordshire with regard to development needs across this sub region, but the Council will also need to</p> <p>consider unmet needs in other areas. One key concern for the wider South East must be London’s inability to meet its own housing needs.</p> <p>1 For some time now the HBF has been raising concerns regarding the ability of London to meet its own housing needs and the capital has consistently failed to meet its targets with regard to housing supply. However, those areas with strong links to London have consistently stated that the capital, through the London Plan, would consume its own smoke. It was expected that the new London Plan would address future needs, and the back log of unmet needs, by delivering over 60,000 homes per annum. What is now clear, following the examination of the London Plan, is that this level of housing supply will not be</p>

- 1 The examination report on new London Plan was published in October 2019 and outlines in paragraph 174 that the overestimation of the contribution of small sites reduces the supply of new homes from 65,000 to 52,000 homes per annum. This means that there is a shortfall of some 140,000 homes between 2018 and 2028 in the capital against its own assessment that the capital needs to deliver 66,000 homes each year across the plan period to meet future need and address the current backlog. However, there must also be a concern that the capital will struggle to meet the 52,000 homes identified in the examination report as being London has consistently delivered fewer homes than it required with average delivery over the last five years of just under 33,000 additional dwellings with the first year of the new London Plan delivering 36,000 new dwellings. Without a significant increase in delivery, it is almost inevitable that the identified shortfalls will drive increased levels of out-migration from the capital to surrounding areas adding pressure in housing markets where affordability is already poor.
  
- 1 As such a lack of supply in the capital will place greater pressure on Dacorum and similar areas that form part of the wider regional housing market focussed on the capital, as households seek to meet their accommodation needs outside of As we are sure the Council are aware migration into Dacorum has been increasing over the last ten years. In 2012 migration from London was 1,049 people by 2019 this had increased to 1,4201. These strong migratory links with the capital indicate that Dacorum should be seeking to meet some of London's unmet needs. This is especially pertinent given the worsening affordability seen in Dacorum over the last ten years that will not be addressed if London's housing needs are ignored. It is therefore essential that any consideration as to the housing needs in Dacorum takes account of the shortfalls in supply in London given the Borough's strong migratory links with the capital.

*Overall housing supply and delivery*

- 1 The Council expect this local plan to deliver around 16,900 homes over the plan period which, as we outline above, will not meet the minimum number of homes they are required to plan for as established through paragraph 60 of the NPPF and

1 Internal migration: detailed estimates by origin and destination local authorities, age and sex (ONS)

its associated guidance. The Council will, self-evidently, need to identify land to deliver a further 1,514 homes. In addition, the Council should ensure that there is sufficient flexibility in their supply to ensure needs are met. The Council has

recognised this in paragraph 7.128, and it will be important that this is factored into planned supply. The HBF recommends that a 20% buffer in supply is necessary to ensure that the minimum housing requirement is delivered over the plan period.

- 1 With regard to how these homes will be delivered the Council will need to try and ensure that any additional supply is not pushed back until much later in the plan The Council’s assessment of housing land supply indicates that, in their best-case scenario, the Council will have land to deliver 5.1-year housing land supply on adoption in 2022. The Council recognises that this is marginal, and a higher requirement will mean the Council will not have a 5-year housing land supply on adoption.
  
- 1 The temptation will be to identify further large strategic sites that push delviery of these homes towards the end of the plan period and use a stepped housing requirement to maintain a five-year land supply. However, we would suggest that this is not consistent with the approach set out in Planning Practice Guidance which states that Council’s should not “... seek to unnecessarily delay meeting identified development needs”. Therefore, in seeking to address the shortfall in supply we would suggest that the Council seeks, in the first instance, to identify a range of small and medium sized sites that will bolster delviery in the early years of the plan and ensure the Council will have strong five-year land supply during this period.
  
- 1 Given the limited capacity in the urban areas of Dacorum the additional sites required to meet needs in full will need to be found through further amendments to the Green Belt boundary. The Council already consider there to be exceptional circumstances required for such an approach to be taken and it will be important for the Council to progress quickly with the identification of the sites

**Included files**

**Title** The Housing Strategy

**ID** EGS15082

**Person ID** 1261425

**Full Name** Camilla Pascucci

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>1 I object to the housing numbers that have been proposed in this consultation. The government must be challenged on the numbers put</p> <p>Why are outdate ONS figures of 730 dwellings being used, when applying the algorithm increases it to 1023 dwellings per year?</p> <p>Clearly these are out of date figures. The latest ONS projections for Dacorum is 355 houses per year. Applying the algorithm to this latest number, this would suggest that the maximum figure for our housing target should be 497 dwellings a year.</p> <p>This inflated target is in large part responsible for the huge amount of Green Belt that is put forward to be released for housing as part of this Local Plan and will provide</p> <p>an overprovision of housing in the area. The current proposed plan promotes building nearly 17,000 new homes within our borough of which 60% is Green Belt, meaning the houses will be built right up to the boundaries of the Chilterns AOB. This will have significant impact on the special biodiversity we have in Dacorum.</p> <p>The Council has failed to take account of the National Planning Policy Framework, paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constrains including the impacts on the Green Belt and AONB.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15090
<b>Person ID</b>	1270924
<b>Full Name</b>	LINDA HUSSEY
<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>The Housing Delivery Strategy comment</b>	The removal of land from 'GREEN BELT' status. This land has the protection of Green Belt and should not be built upon. The Government should look at its own algorithm for deciding the level of housing development in Dacorum. Their figures appear far too high for this area. The proposed numbers will lead to a loss of Green Belt land in some cases involving the loss of habitat for birds and animals.
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15096
<b>Person ID</b>	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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Housing Delivery Strategy comment</b>	<p>The housing strategy should reflect our vision given in question 1.</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>Berkhamsted &amp; Tring Developments</p> <p>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.</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.

**Included files**

**Title** The Housing Strategy

**ID** EGS15110

**Person ID** 1270934

**Full Name** Mr Leonard Hussey

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment** The removal of land from 'GREEN BELT' status. This land has the protection of Green Belt and should not be built upon. The Government should look at its own algorithm for deciding the level of housing development in Dacorum. Their figures appear far too high for this area. The proposed numbers will lead to a loss of Green Belt land in some cases involving the loss of habitat for birds and animals.

**Included files**

**Title** The Housing Strategy

**ID** EGS15118

**Person ID** 1222814

**Full Name** Alex MacGregor

**Organisation Details** Senior Planner  
Quod Ltd (ON BEHALF OF PIGEON INV MAN LTD)

**Agent ID**

**Agent Name**

**Agent Organisation**

<p>Yes / No * Yes * No</p>	<p>Yes</p>
<p><b>The Housing Delivery Strategy comment</b></p>	<p>Policy SP4 sets out DBC’s Housing Strategy and Pigeon Hemel Hempstead Ltd notes that the policy (along with Policy SP1) sets a <i>minimum</i> housing target of 16,596 net additional homes over the plan period, which equates to 938 dwellings per annum (dpa). Pigeon Hemel Hempstead Ltd recognises this is a significant increase from the current adopted target of 430 dpa, but also recognises that this increase is needed to meet the significant housing needs of the Borough.</p> <p>Pigeon Hemel Hempstead Ltd also note that this target was based upon the Government’s interim Standard Methodology calculation of 922 dpa. Following the publication of the Dacorum Local Plan Emerging Strategy for Growth (2020-2038) consultation, the Government made changes to the Standard Methodology on the 16 December 2020. Based on the latest calculations, Dacorum’s Local Housing Need has increased from 922 dpa to 1,023 dpa, equivalent to a minimum of 18,414 new dwellings over the Plan period to 2038. It is important that the Local Plan seeks to meet this minimum housing requirement along with an appropriate buffer of at least 5% to provide flexibility and ensure delivery. The housing requirement should therefore be adjusted accordingly in accordance with the commitment set out at paragraph 7.5 of the draft Local Plan.</p> <p>As published, however, the draft Plan does not justify why it does not also contribute to the clear unmet needs of neighbouring authorities. The Housing Topic Paper that DBC has prepared, which forms part of the evidence base, states at paragraph 7.3 that DBC has been approached by some authorities concerning their unmet housing need, including Hertsmere, Three Rivers, Watford and Barnet. However, the draft plan provides little justification as to why DBC cannot accommodate some of the unmet need from these authorities. Paragraph 1.36 of the Plan just states that:</p> <p><i>“The assessments we have completed to date indicate that Dacorum is unlikely to be in a position to provide for unmet housing needs arising from the South West Hertfordshire area [Dacorum, Hertsmere, St Albans, Three Rivers and Watford] in this Plan period whilst still ensuring the Plan is consistent with the provisions of the NPPF and wider sustainable development objectives”</i></p> <p>It is considered that further justification of this approach and evidence that the Council has positively engaged with neighbouring authorities on these issues to ensure that the Duty to Cooperate is met.</p> <p>Pigeon Hemel Hempstead Ltd welcomes that Policy SP4 confirms that the urban extensions of Hemel Hempstead are required to make a major contribution towards meeting the minimum housing target. It is evident from the policy that the allocation and delivery of the North and East of Hemel Hempstead Growth Area is essential if DBC is to meet its housing targets, particularly given the increased local housing need under the Standard Method.</p>

## **Safeguarding of Growth Area HH02: North Hemel (Phase 2)**

However, Pigeon Hemel Hempstead Ltd do not agree with part of the Sustainable Development Strategy. Both Policy SP2 and SP4 state that the urban extension to the north of Hemel Hempstead will be divided into two phases. It notes Phase 1 (Growth Area HH01) will deliver 1,500 homes within the plan period and that the land for Phase 2 (Growth Area HH02) will be released from the Green Belt but then safeguarded for the delivery of 4,000 new homes beyond the plan period, i.e. after 2038. This deferral of development is not justified or appropriate.

Whilst paragraph 139 of NPPF does allow land to be safeguarded, paragraph 59 of the NPPF also stresses that housing supply needs to be significantly boosted. The NPPF notes at paragraph 35 that Plans are found sound at examination if they are positively prepared, justified, effective and consistent with national policy. The NPPF notes at paragraph 35 that a requirement of being 'positively prepared' is that the plan must, as a minimum, meet the area's objectively assessed need.

As noted above, based on the latest standard method, Dacorum's Local Housing Need has increased from 922 dpa to 1,023 dpa, from a minimum of 16,596 net additional homes over the plan period (to 2038) to a minimum of 18,414 net additional homes. DBC therefore needs to provide at least an additional 1,818 homes over the plan period to meet its Local Housing Need and there is no justification for planning to defer development. In addition, DBC must consider the ability of the Plan to contribute towards the unmet needs of neighbouring authorities.

Paragraph 73 of the NPPF is also clear that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and that the supply of specific deliverable sites should, in addition, include a buffer. Paragraph 22 of the PPG states that the purpose of the buffer is to:

*“ensure that there is a realistic prospect of achieving the planned level of housing supply”*

Therefore, it is also important that DBC apply an appropriate buffer of at least 5% to provide flexibility and ensure delivery, in accordance with paragraph 73 of the NPPF. In the context of the increase in Dacorum's Local Housing Need and the need for the Plan to provide a buffer, there is no reason why DBC should delay the delivery of Phase 2 (Growth Area HH02) beyond the plan period.

There is also no reason why DBC should plan a slowdown in the delivery of housing in the latter part of the Plan period, as indicated in the housing trajectory in Figure 2 (page 38) of the emerging Plan. Figure 2 shows the delivery of housing

almost halving between 2027/28 (1,347 dwellings) and 2035/35 (716 dwellings), then by 2037/38, the trajectory falls even further to just 400 dwellings.

To address these issues DBC should enable Phase 2 (Growth Area HH02) to begin to come forward within the plan period and before 2038. Whilst this major growth area will clearly take many years to deliver in full with delivery likely to extend into the 2040s, enabling, rather than preventing Phase 2 (Growth Area HH02) coming forward within the plan period would enable DBC to meet its latest Local Housing Need figure and would also enable DBC to incorporate an appropriate NPPF buffer to allow for sufficient flexibility in the housing market.

Furthermore, and importantly, housing and infrastructure need to be delivered together. The North and East of Hemel Hempstead Growth Areas are allocated for the delivery of a strategic corridor route between Leighton Buzzard Road and Redbourn Road, as stated in Growth Area HH01 and Growth Area HH02. Phase 2 (Growth Area HH02) provides the essential eastern access to land in SADC to enable the strategic corridor route to reach Redbourn Road. Therefore, artificially delaying Phase 2 may also delay the provision of this essential strategic corridor route in to the 2040s, which would undermine the deliverability of the whole North and East of Hemel Hempstead Growth Areas.

Greater flexibility is therefore required within the Local Plan both to ensure that the Council is able to meet its Local Housing Need in full but also to ensure that the Plan does not unnecessarily constrain the delivery of the HGC Growth Area, should the necessary infrastructure be put in place or should circumstances change.

Notwithstanding the comments above, should DBC continue to safeguard Phase 2 (Growth Area HH02) for development beyond 2038 Pigeon Hemel Hempstead Ltd consider that further justification is required for such an approach to ensure that DBC is able to demonstrate exceptional circumstances to release the land from the Green Belt now (in 2021), for development planned for after 2038.

Overall, the NPPF stresses that housing supply needs to be significantly boosted, and Pigeon Hemel Hempstead Ltd believes there is a compelling case for North of Hemel (Phase 2) to be brought forward earlier with delivery commencing before the end of the plan period i.e. prior to 2038 but with delivery continuing beyond 2038. In short, the Local Plan should not seek to artificially delay the delivery of much needed homes within an area of high housing need or the proposed link road between Leighton Buzzard Road and Redbourn Road. In this regard, the draft Local Plan is not considered to be positively prepared, justified or consistent with national policy.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy

<b>ID</b>	EGS15128
<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>The Housing Delivery Strategy comment</b>	Section 7 of the Emerging LP has regard to <i>The Housing Strategy</i> and <b>Policy SP4: Delivering the Housing Strategy</b> will be the mechanism for doing so, where part 1(l) of the policy confirms that small to medium scale strategic urban extensions on the settlement edges of the Large Villages, including at Bovingdon (at Grange Farm) for around 150 new homes, will be proposed. BPC considers that this level of proposed development, as a maximum, together with the completion of the existing committed housing site at Chesham Road/Molyneaux Avenue (Site Bv02) for some 40 homes, is appropriate for the village across the Plan period
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15237
<b>Person ID</b>	1163189
<b>Full Name</b>	Shenagh 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>The Housing Delivery Strategy comment</b>	I wish to object to the Dacorum Local Plan on the following grounds:

- 1 The number of houses proposed is too great for the towns' future needs and should be based on the most recent 2018 Office for National Statistics projections which I understand are more modest. The Government is proposing to revitalise the north of England but less housing is proposed there than in the much more crowded
- 2 The Green Belt land in Dacorum is very valuable to local residents for recreation, wildlife and the separation of each town. Despite this, much of the proposed housing in Dacorum is to be built on Green Belt land which, once built on, will be lost to the community at large. Consideration should be given to the value of this Green Belt land in the light of the coronavirus pandemic. It is important that the towns in Dacorum remain separate and maintain their own individual Developments such as Bulbourne Cross between Berkhamsted and Bourne End must not be allowed to encroach on the rural land which separates each town and village.
- 3 Insufficient regard is given in the Local Plan to the area's infrastructure. The development proposed will place an intolerable burden on the infrastructure, particularly in regard to the volume of traffic generated in town centres, the provision of water and waste treatment. Hospital services. are also under pressure currently and increased housing will only make this worse.
- 4 The proposed volume of housing will have a severe and detrimental impact on the provision of water and sewerage services which are already under strain. Water would have to be taken from the chalk aquifer and this would damage the area's valuable chalk streams which are already under threat.
- 5 More regeneration of brown field sites should be considered. The coronavirus pandemic is having a great impact on business and commercial practice and should be taken into account for future plans.
- 6 Dacorum is home for thousands of people and provides a pleasant environment with its individual country towns and attractive rural setting. The town centres are the hub of each town and if too much housing on the periphery of towns is allowed the centres will be swamped with traffic. Berkhamsted, in particular, is far too hilly for residents living in the proposed developments on the upper periphery of the town to walk or cycle to and from the town centre.

Please give consideration to these points and amend the Dacorum Local Plan.

**Included files**

**Title** The Housing Strategy

**ID** EGS15240

**Person ID** 1145136

**Full Name** Mr Garrick Stevens

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes  
\* Yes

\* No

**The Housing Delivery Strategy 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 SP4.pdf</a>
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15241
<b>Person ID</b>	1271085
<b>Full Name</b>	Margaret and Geoffrey Lunn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>Despite our address, we are actually in Bucks so our objections to this scheme are certainly not Nimbyism.</p> <p>Whilst agreeing that our country is over populated we were astonished &amp; dismayed to discover that Dacorum Council are planning to build such a large development at the gateway to Tring. Tring has been a market town since the 14 th century &amp; this development would change the town for ever. Land is a finite source &amp; once lost it is lost for ever. Surely there are brownfield sites even in Tring that can be utilised/or smaller developments. The Aylesbury side of Tring is already under construction &amp; this should be enough for large scale building.</p> <p>As non-residents of Tring, we are not in a position to even guess if the town's present infrastructure could support hundreds more houses &amp; commercial concerns but it seems unlikely.</p> <p>The first Google entry for Tring says "Tring is a market town &amp; civil parish in the Borough of Dacorum ,Hertfordshire. It is situated in a gap passing through the Chiltern Hills, classed as an Area of Outstanding Natural Beauty 30 miles from London."</p> <p>How sad it would be if your planners were the ones responsible for changing the "is" to "was"</p> <p>Please think carefully before you change the whole character of this approach to the town.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15253
<b>Person ID</b>	1262809
<b>Full Name</b>	JUDITH HONOUR
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Housing Delivery Strategy comment</b>	<p>I am writing to express my extreme concern and disagreement regarding the proposed new housing, sports centre and school developments planned for Berkhamsted. I have lived in Berkhamsted for 54 year-s and have seen the huge expansion of Berkhamsted over this time and am totally distraught at all of the new development proposals planned. Having witnessed the recent Bearoe Park development and the affect this has had on the local roads and the crowding</p>

this has created, it is really upsetting to hear of new developments which will build on our beautiful green fields, many of which I have regularly gone for lovely countryside walks across.

Berkhamsted is a beautiful market town surrounded by green belt countryside, which is now being ruined by all these proposed and current developments. We cannot take any more. At peak times the traffic in the High Street is at a logjam with queues way back out of the main parts of the town.

This is now taking away our green belt land and will completely kill the character of Berkhamsted.

I beg you to not approve these proposals as enough is enough (I am so upset by the sheer numbers of these proposed developments that I struggle to sleep and am writing this through tears). This to me, my local friends, family and neighbours is a complete nightmare.

Please, please save our Berkhamsted countryside, we cannot lose any more.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS15256

**Person ID**

1271088

**Full Name**

MIKE WALTERS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

Please find enclosed my objections - views shared with a substantial number of fellow Tring residents - in response to the Local Plan Emerging Strategy for Growth 2020-2038 document.

I wish to register, in the strongest possible terms and a maximum sense of outrage, the proposals to turn Tring from a finite market town into an urban sprawl.

What, exactly, have we done in Tring to deserve an expansion of up to 55 per cent population with a house-building programme which would be environmental vandalism and a grotesque violation of the Green Belt?

Why are we being singled out for this monstrous treatment?

The scale of development outlined is indefensible, immoral and, in my submission, probably illegal in terms of the unfair and disproportionate share of the house-building burden Tring is being asked to bear.

If I had wanted to move to a suburb of Milton Keynes, I would have bought a house there in the first place.

Once Green Belt areas are concreted over with housing/infrastructure, they are gone forever.

Any councillors or politicians - at parish, borough, county or parliamentary level - who vote in favour of the proposals relating to Tring as they stand will go down in history as ecological hooligans and statutory pariahs (I am inclined to use a stronger, vulgar noun but restraint has its virtues).

This is not a simple case of Not In My Back Yard. If there is a shortage of housing nationwide, I accept Tring should not be immune to new bricks and mortar. But on what basis should we be expected to accept expansion way above the local and national average required? The notion is obscene.

And if **affordable** housing is the goal, why are homes on the sizeable Roman Park development currently under construction, between Icknield Way and Aylesbury Road on the town's western fringe, starting at nearly £400,000 asking price?

If more homes - not expensive homes - is the No.1 criterion, why did you grant planning permission for yet more properties way beyond the reach of first-time buyers (and most buyers)?

There are other factors which should compel **every** local authority to exercise extreme caution before violating Green Belt land, such as the fall-out from the Covid-19 pandemic, which has turned working from home into a new way of life

for many. Does that not leave office blocks in our cities, once populated by commuters, lying empty? Does that not make countless brown-field sites ripe for redevelopment as housing, instead of vandalising semi-rural market towns like Tring?

Under no circumstances do I accept that the town where I have lived for almost 25 years should be over-developed on the preposterous scale outlined in the Dacorum Local Plan 2020-2038.

This is not just a battle for Tring's soul. It is an acid test of public administration's integrity, and I shall be monitoring events in this 'consultation' process like a hawk - both personally and professionally.

**Included files**

**Title** The Housing Strategy

**ID** EGS15258

**Person ID** 1271089

**Full Name** Patrick Sullivan

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am writing to express my objection to the proposed development outlined in Dacorum Borough's Council document, titled, "Emerging Strategy for Growth 2021-2038".

My principle objections are;

- 1 Proposed housing development appears over estimated . I question the formula the Council has used to obtain these figures. For a small village like Northchurch, over 200 houses appears far too high. Let alone, the increased housing in South Berkhamsted as well.

- 1 Loss of Greenspaces and Green Belt Land. I have lived in my house since it was built and have enjoyed the green fields behind Chaucer Close and by Bell and Darrs Lane, including the fields by the A41. My husband and I do not drive and the ability to access greenspaces, from our house on foot, has been invaluable. It was a godsend for our mental health during this pandemic, as unable to shop or go anywhere, our daily walk included these spaces to take in the stunning. Once these green spaces are gone - they are gone, we can never get them back for our future generations to enjoy like we have.
  
- 1 Water and Sewerage. I am very concerned about the potential for flooding with the increase in housing. Especially as I live lower down in the valley and further down from where this huge development would be built. I believe DBC is relying on outdated data which shows potential water supply and drainage issues.
  
- 1 Northchurch's Identity. I believe it is important for Northchurch to retain its identity and community rather than be renamed as "West Berkhamsted". I have lived here all my life, my daughter and my Grandsons are also residents of Northchurch and the community feel here would be lost with the proposal of all these houses and lack of amenities to go with it.

**Included files**

**Title** The Housing Strategy

**ID** EGS15262

**Person ID** 1271091

**Full Name** Verlie Sullivan

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

I am writing to express my objection to the proposed development outlined in Dacorum Borough's Council document, titled, "Emerging Strategy for Growth 2021-2038".

My principle objections are;

- 1 Proposed housing development appears over estimated . I question the formula the Council has used to obtain these figures. For a small village like Northchurch, over 200 houses appears far too high. Let alone, the increased housing in South Berkhamsted as well.
  
- 1 Loss of Greenspaces and Green Belt Land. I have lived in my house since it was built and have enjoyed the green fields behind Chaucer Close and by Bell and Darrs Lane, including the fields by the A41. My husband and I do not drive and the ability to access greenspaces, from our house on foot, has been invaluable. It was a godsend for our mental health during this pandemic, as unable to shop or go anywhere, our daily walk included these spaces to take in the stunning. Once these green spaces are gone - they are gone, we can never get them back for our future generations to enjoy like we have.
  
- 1 Water and Sewerage. I am very concerned about the potential for flooding with the increase in housing. Especially as I live lower down in the valley and further down from where this huge development would be built. I believe DBC is relying on outdated data which shows potential water supply and drainage issues.
  
- 1 Northchurch's Identity. I believe it is important for Northchurch to retain its identity and community rather than be renamed as "West Berkhamsted". I have lived here all my life, my daughter and my Grandsons are also residents of Northchurch and the community feel here would be lost with the proposal of all these houses and lack of amenities to go with it.

**Included files**

**Title** The Housing Strategy

**ID** EGS15269

**Person ID** 1271104

**Full Name** ALISON BRAITHWAITE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>The Housing Delivery Strategy 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>	The Housing Strategy
<b>ID</b>	EGS15283
<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>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>• <b><u>Housing Strategy (para 7.17)</u></b> : This paragraph requires clarification since it is unclear how the Growth Area allocations will contribute to the Government target of 10% of the housing requirement coming from sites of one hectare or</li> <li>• <b><u>Housing Strategy (para 7.20)</u></b> : The decision to avoid the formal phasing of sites (other than where dictated by lead-in times and the provision of infrastructure) is sensible and prudent in the circumstances of this plan where a substantial uplift in housing completions is required.</li> </ul>

- **Housing Strategy (para 7.20)** : To be consistent with Policy SP2, the reference to phase 1 of North Hemel Hempstead should say “*can deliver a minimum of 1,550 homes in the Plan period*”.
- **Policy SP4 : Delivering the Housing Strategy** : To be consistent with Policy SP2, 1(i) should refer to “*a minimum of 1,550 homes in the Plan period at North Hemel Growth Area (Phase 1)*”. The reference to North Hemel Growth Area Phase 2 should be amended to “*around 4,000 homes beyond 2038*” to provide an element of flexibility.

**Included files**

**Title** The Housing Strategy

**ID** EGS15325

**Person ID** 1271128

**Full Name** Little Gaddesden Parish Council c/o Cllr John Saner

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

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** The Housing Strategy

**ID** EGS15363

**Person ID** 1271226

**Full Name** SIMON SMITH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

think Dacorum needs to look very carefully at the actually numbers of houses required and also address the need for affordable housing. I have 3 young sons, one of which has had to move out of the area as he just can't afford to buy in Tring. The other 2 are also living at home and will be unable to buy locally given the current prices. Homes also need to have an environmental responsibility which is not addressed in this plan. Any houses built should be carbon neutral with solar panels not relying on fossil fuels, rainwater harvesting and electric car charging points. All this is possible, and Dacorum should take the lead in being environmentally aware of its developments. It is also very important to get the balance between nature and development. Wildlife and our natural environment has a huge impact on our physical and mental well being and we are blessed in Tring to be

**Included files**

**Title** The Housing Strategy

**ID** EGS15373

**Person ID** 1271232

**Full Name** MR & MRS P J TAYLOR

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>2}"Too many' houses are proposed for Dacorum in general and Berkhamsted and Northchurch in particular. We understand that the numbers proposed are based on a calculation that is outdated and wrong and that calculations carried out by other experts indicate that this should be much lower. About a third of the current proposal. We also understand that this figure should be a starting point and should take into account local circumstances and restrictions including our greenbelt and the surrounding AONB which should further reduce the allocation.</p> <p>This means the whole basis of the plan and the consultation unsound.</p> <ul style="list-style-type: none"> <li>• Destruction of Greenbelt -., ' .</li> </ul> <p>The countryside is very important to us and the character of Shootersway with its ancient ditches, hedgerows and woodland are important, not just to us having lived here for almost 60 years, but also for the wildlife that lives in them, the hedges and trees forming an important corridor linking up many areas of copse and woodland including Hockeridge and the woodlands of Rossway and Champneys. We would be devastated if these important landmarks were lost to make way for housing which will not benefit the existing community.</p> <ul style="list-style-type: none"> <li>• Local Roads The proposals would mean more than 2000 extra households on this side of the valley. This will mean a lot more traffic, Cross Oak Road already suffers from too much traffic you often have to wait a long time above the pinch point above Greenway before you can come down the The junction of Cross Oak with Anglefield is becoming more dangerous as many people don't expect to have to slow or stop here, finally the lower part</li> </ul> <p>of Cross Oak Road is already congested as the parked cars make it single track. Cross Oak Road cannot take additional traffic, this was realised when the pinch point was put in.</p> <p>Berkhamsted was given a bypass as the High Street traffic was too congested, but traffic levels are almost back to where they were and there are frequently long queues for the traffic lights in the centre. Additional housing will only make this worse. We know that Tring residents also frequently shop in Berkhamsted so the proposals in Tring will also adversely affect us.</p> <p>The extra traffic noise and pollution will also directly affect us and other residents in the town.</p> <ul style="list-style-type: none"> <li>• The extra traffic will generate extra pollution, air pollution monitoring has shown that the fumes accumulate in the valley meaning that an increase in the number of cars in Berkhamsted and Tring will affect our air quality especially in the valley bottom. Five of our schools two of our doctor's surgeries, our dentists and our High street shops will have worse air quality.</li> </ul> <p>Even if combustion engines are replaced by electric cars, they will still generate dust from tyres and brakes.</p>

- Water, most of our water comes from the chalk beneath us, but this is a limited The River Bulbourne used to start in Bulbourne but now starts near the Cow Roast because of abstraction. In dry years our Chalk river dries up and does not flow, the more water that is abstracted the more frequently this happens, yet globally Chalk streams are very rare and should be protected, not just from too much water being taken out but also from the surface runoff and pollution of urban areas.

The water needed by the extra housing will further damage the river and the habitats it supports.

**Included files**

**Title**

The Housing Strategy

**ID**

EGS15379

**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

**The Housing Delivery Strategy comment**

Policy SP4 (Delivering the Housing Strategy)

Whiteacre Ltd notes the housing requirement within the draft Local Plan. Under draft Policy SP4 (Delivering the Housing Strategy) the Plan seeks to deliver a minimum of 16,596 net additional homes across the Borough over the period 2020-2038, equivalent to 922 dwellings per annum. This will be partly delivered through small to medium scale strategic urban extensions on the settlement edge of Bovingdon (150 homes), Kings Langley (145 homes) and Markyate (150 homes).

Whilst Dacorum are currently making positive steps towards their new Local Plan, their land supply picture until March 2024 is calculated using a five-year requirement of 430 dwellings per annum based on the extant Core Strategy. This is contrary to paragraph 73 of the NPPF2019.

Notwithstanding this Whiteacre notes that the proposed ability to demonstrate a five-year supply of deliverable sites towards the Core Strategy requirement remains extremely marginal, without the consideration of the recent Government figure (December 2020) for Dacorum of 1,023 dwellings per annum based on local housing need.

These issues are relevant material considerations to assessing the proposed delivery of the housing requirement and the effectiveness of the emerging strategy. Due to past delays in plan-making (and implementing the Core Strategy and Allocations Plan), Whiteacre emphasises the need for effective and deliverable allocations that can deliver in the early or part of this Plan. Grange Farm, Bovingdon is a site that can be delivered in the immediate term.

The proposed Grange Farm allocation comprises an unconstrained small/medium size site. It is materially different in context to existing sources of supply relied upon by the Council. Including extant commitments in the development plan (such as site allocation LA6 in Bovingdon) that have experienced substantial delays.

In recent years, the Council's record of housing delivery has fallen substantially below the forecast level of completions in the most recent updated development plan (Site Allocations Plan Appendix 2: Updated Housing Trajectory) and the Council's most recent monitoring records. The Council's most recent Authority Monitoring Report (see Table 7.2a and Appendix Figure 7.1) forecasts 4,059 completions from 1 April 2019 to 31 March 2024. Serious doubt must also be expressed at the realism of these forecasts, particularly given that the Council's most recent (1 April 2020) Residential Land Position Statement only records 3,116 units' extant planning commitments. The Council's own evidence indicates a shortfall of around 1,000 units that do not have any planning permission and fall outside the NPPF definition of deliverable.

This is primarily of function of planning permission not yet being granted on key sites identified in 2013 and progressed through the Site Allocations Plan as critical to address the inadequate supply of housing land (e.g. allocations LA1 and LA3). The forecast trajectories and comparison with the Council's recorded net completions are shown below:

**Table 1: Comparison of Forecast and Actual Net Completions**

**2015/16**

**2016/17**

**2017/18**

**2018/19**

**2019/20**

**2020/21**

**2021/22**

**2022/23**

**2023/24**

Site Allocations Plan (Appendix 2)

629

609

709

534

890

491

652

788

618

AMR (Figure 7.1)

641

806

1121

883

608

Actual Completions

659

723

586

493

489

Difference vs Site Allocations Plan

+30

+114

-123

-41

-401

Performance measured using the HDT can be expected to deteriorate significantly ahead of adoption of the Strategy for Growth when the figure for the number of homes required is calculated using the standard method (LHN2020 = 1,023 dwellings) in 2020/21 and beyond. In these circumstances it is imperative that to achieve an effective and positively prepared Local Plan the Council prioritises the early delivery of proposed allocations such as our client's land at Grange Farm.

The draft trajectory in the Plan (see figure 2 below) does not inspire confidence regarding the ability to demonstrate a 5YLS on adoption. Additional detail in the relevant topic paper shows even this trajectory is contingent upon very challenging assumptions for existing allocations and commitments including the 'LA' sites allocated previously. Specifically, in relation to the Growth Strategy for Bovingdon and the extant Local Plan allocation under Site LA6 (Chesham Road) no planning application has been received and none of the anticipated 60 units delivered.

The issues will be compounded, should the housing requirement be revised to accord with the calculation of local housing need using the current standard method.

**Figure 2: Housing Trajectory 2020 - 2038**

[PLEASE SEE FIGURE 2 ON THE HOUSING TRAJECTORY]

In the short-term the housing programme is more dependent on the supply of existing commitments and previous Plan allocations carried forward into this emerging Housing supply peaks over the mid-term of the Plan as the Growth Areas begin to be built-out (alongside a smaller contribution from windfalls). Whiteacre reserves the right to comment further on the justification for the proposed windfall allowance of 200 dwellings per annum.

The Council's proposed development strategy would achieve a relatively equitable apportionment of growth across the Larger Villages, but this does not expressly recognise the larger size of Bovingdon or the lower rate of growth since 2006 as seen in table 1 below.

Under Policy SP27, Grange Farm (Bv01) is allocated as a growth area, which can principally accommodate 150 dwellings, including three hectares of land for future education use. Whiteacre supports the Council's Settlement Hierarchy, whereas Bovingdon is the largest 'Large Village', however it has seen lower rates of development than Kings Langley and Markyate

for the period 2006 to 2019. Villages generally have seen a lower proportion of growth, which the Council considers consistent with the settlement hierarchy.

On 1 April 2019, Bovingdon demonstrates a slightly higher total (but not significant) for extant commitments, which included 32 dwellings comprising only small infill plots, which did not contain affordable housing. The Council's proposed development strategy would achieve a relatively equitable apportionment of growth across the Larger Villages, but this does not expressly recognise the larger size of Bovingdon or the lower rate of growth since 2006.

**Table 2: Comparison of 2006-2019 Completions and Commitments – Large Villages**

**Bovingdon**

**Kings Langley**

**Markyate**

**Large Villages Total**

**District Total**

**% of District Total**

2006-2019 Completions

35

68

159

262

5838

4.5%

**% of Large Village Total**

13%

26%

61%

1 April 2019 Commitments

32

6

9

47

3222

1.5%

% of Large Village Total

68%

13%

19%

Growth Strategy Housing Provision

241

274

215

730

16899

4.3%

% of Large Village Total

33%

38%

29%

The latter half of the housing programme sees a steady fall in delivery as the Plan becomes more reliant on the larger greenfield Growth Areas.

The draft allocation of Grange Farm demonstrates the need to deliver appropriate and proportionate growth in larger villages, such as Bovington which can be delivered at the beginning of the Plan Period.

In terms of the Council's Housing Topic Paper the forecast delivery of the proposed Grange Farm allocation expected over 4 years from 2025/26. Whiteacre is of the view that early delivery of the unconstrained proposed Grange Farm allocation can be prioritised substantially ahead of this date. The Council's Local Development Scheme anticipates adoption of the Local Plan in November 2022. The Council's trajectory should be modified to anticipate construction of the first dwellings commencing within 12 months of adoption. This anticipates that a planning application will be lodged prior to October 2022 together with all supporting technical evidence to allow for determination upon adoption of the Plan and physical completions being achieved in the 2023/24 monitoring year.

In view of the acute housing delivery shortfall, the Housing Trajectory notes provision for a fairly broad mix of Only the proposed North Hemel SUE has build rates in excess of 200dpa from 2032/33. Non-delivery of a single site is unlikely to critically undermine the strategy, but overall concentration of growth at Hemel is considered to be a relevant risk to overall effectiveness.

It is, however, noted that Major sites e.g. East of Tring and South of Berkhamstead are expected to commence at the same time as Grange Farm. These forecasts need to be checked for realism in terms of the Delivery Strategy and may not offer the same benefits of early delivery as the proposed strategy at Bovington.

There are relatively few (c.700) affordable housing commitments. Delivery of a policy compliant 40% on Grange Farm should be seen as a significant benefit. These representations are without prejudice to any further risk that may be identified regarding forecast affordable housing supply on other proposed allocations.

These representations are also without prejudice to any future options that the local planning authority considers in terms of demonstrating how the housing requirement will be met over the plan period. Should the Council wish to explore options for a 'stepped' trajectory at some point this is not something that these representations would readily endorse. However, it is recognised that such approaches can be appropriate in certain circumstances. However, in accordance with the relevant Planning Practice Guidance this would be contingent on helping to prioritise unconstrained sites (i.e. Grange Farm) and meeting needs in full (see PPG ID: ID: 68-021-20190722).

### **Local Housing Need**

The starting point for assessing the Council's evidence base and the proposed housing requirement under Policy SP4 is set out in paragraph 60 of the NPPF2019, which should be read alongside the presumption in favour of sustainable development under paragraph 11. It is noted that the position of national policy has been clarified since publication of the emerging draft Strategy for Growth. However, the draft Plan does not provide for the minimum number of homes required, when based of the calculation of local housing need using the standard method.

The Council has not sought to identify exceptional circumstances to provide for a lower assessment of housing need in accordance with NPPF2019 paragraph 60, instead relying on the alternative outcome of local housing need calculated using proposed revisions to the standard method (Summer 2020). This is supported.

In accordance with paragraph 11(b) of the NPPF2019 is it necessary for the next iteration of the draft Local Plan to fully address whether local housing need (based on the current standard method) can be met in full, unless:

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Without prejudice to any further evidence to be produced by the Council, it is considered that the most recent guidance relating to calculation of local housing need further reinforces the existing justification for the minimum level of growth proposed at Bovingdon and proposed allocation at Grange Farm.

This section provides a brief overview and contextual background to the updates to Planning Practice Guidance following publication of the government's 16 December 2020 response on how local housing need is to be calculated using the standard method. This follows consultation on proposed changes to the planning system in Summer 2020.

It is important to preface the current position with the fact that the government has consistently reiterated its view that the household projections cannot be used to forecast housing need in isolation, given that they in principle reflect the continuation of past trends.

This supports a rejection of arguments that a reduction in more recent projections should result in fewer homes being built, particularly where the resulting assumptions are lowered by the suppression in household formation primarily reflected by increased rates of overcrowding or concealed households.

The government cites statements from the Office for National Statistics (ONS) to the same effect that provide a 'health-warning' against drawing conclusions of reductions in housing need based solely on the most recent household projections.

Secretary of State for the MHCLG, Robert Jenrick, released a Ministerial Statement alongside publication of the government's 16 December 2020 response. This restates the government's objective to increase housebuilding to provide for 300,000 completions per annum, ensuring that the starting point provided by the standard method provides certainty, stability and clarity for plan-making. Importantly, the Ministerial Statement reflects the government's position to:

*"leave the standard method as it was created in 2017 for the majority of the country. We have seen that these levels are beginning to create ambitious plans in many parts of the country, which we expect to drive housing delivery beyond its current near record levels. It is also clear that the standard method does not act as a ceiling for the ambitions of some local authorities, with some planning to exceed their local figures to meet the needs of their residents, create jobs and drive economic growth in their areas."*

The Ministerial Statement goes on to describe the limited changes to the standard method in relation to the 'cities' uplift as recognising the need to go further in some areas. Critically, however, the nature of the changes implemented is

fundamentally narrower in scope than initially suggested. Calculation of the standard method for Dacorum Borough Council has not been affected by the changes implemented (no 'cities uplift' applies) and the calculation of local housing need at **1,023dpa** ('2020-based') is unchanged from previous guidance.

The content of the Ministerial Statement reflects the government's specific response to the revised standard method consultation proposals. This sets out the rationale for retaining the current approach, specifically indicating that:

*"...will provide stability and certainty for plan-making and decision-making, so that local areas can get on and plan based on a method and level of ambition that they are familiar with."*

The rationale outlines that the benefit of this consistency should ensure that work to progress new Local Plans can be completed as quickly as possible.

In addition to providing the stability referred to above, the PPG recognises the role of the 2014-based projections (with an appropriate uplift for affordability) in ensuring that "historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes"

Separately, the government's response also outlines the importance that that all areas plan for the right, size, type, and tenure of homes, and in particular to ensure that appropriate numbers of family homes come forward. This reflects their role in maximizing the benefits of increasing housing delivery, including the impact on addressing constraints to affordability and requires housing distribution across all sectors and all locations.

This is particularly relevant in areas of high affordability ratios. Planning for levels of future housing provision that would maintain and 'lock-in' trends of suppressed household formation and is not a sound approach to policymaking.

Finally, it is worth reflecting that the government's latest position regarding the starting point for the standard method is largely unchanged from its 2019 response which followed the consultation on proposed technical changes to the National Planning Policy Framework in relation to local housing need. As part of this response the government cited the same objectives of providing continuity between assessments of housing need over time together with consistency and transparency for the purposes of plan-making.

The government's response illustrates further grounds to reject use of the 2016-based (and by extension) 2018-based projections. While the government's 2019 response trails the intention to consult on proposed changes to the standard method it is clear now that the same objectives continue to apply and that the 2014-based projections therefore provide the relevant starting point.

<b>Included files</b>	<a href="#">Whiteacre - fig 2 - housing trajectory.jpg</a>
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15404
<b>Person ID</b>	1263914
<b>Full Name</b>	DARREN 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>The Housing Delivery Strategy comment</b>	<p>I want to object to the proposed new homes in our local area (Dacorum) for the following reasons:</p> <ul style="list-style-type: none"> <li>• The property numbers really concerns me the most. The 16,899 homes is a disproportionate increase considering the Governments projected population growth statistics. This is an unreasonable and unnecessary burden to undertake for our locality.</li> <li>• The impact of the proposed housing in our neighbouring towns of Tring and Berkhamsted, in addition to the 400 houses in Northchurch, will cause traffic congestion especially on our High Street. That's not discounting the obvious increased pollution and hazard this poses our children especially with our school placed right bang centre of the village with poor side-walks and access.</li> <li>• Northchurch is a village and is therefore very connected to its beautiful local countryside. Building on Green belt here and in Dacorum is unlawful as it has not been proven to be necessary. Within minutes of my home I can walk into lovely countryside and enjoy the peace and fresh air it provides, as well as the nature that inhabits it. You can not undervalue its importance for our physical and mental well being which to be honest has been highlighted in this Pandemic</li> <li>• I really worries me that we would lose our community and village identity as we meld into Berkhamsted. We are proud and see ourselves apart from Berkhamsted and wish to keep it this way. I've read mention of our village as 'West Berkhamsted' and this upsets me as we have lovely tree lined roads a plenty, drives for our cars to park on and our own real sense of identity quite different to Berkhamsted.</li> </ul> <p>Please see the bigger picture and realise how unreasonable your current proposal is</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15417
<b>Person ID</b>	1271261
<b>Full Name</b>	Gavin and Victoria Rees
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>This letter puts forward my opposition and concerns on the current 'Emerging Strategy for Growth 2020 - 2038'. My objections are based upon the following issues:</p> <p>1. <u>The Number of Proposed houses</u></p> <p>The number of proposed houses within the development plan were developed by an algorithm rather than actual requirements. The latest projections from the Office of National Statistics says that 355 dwellings per year for Dacorum are required, but the development plan is putting forward for 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 a housing need calculation that is less than half of that currently proposed in the plan.</p> <p>It is clear that the proposed number of houses is just not required or suitable for Dacorum area. The plan is also flawed as it will not be dealing with a case of supply and demand, as it will not be addressing affordable housing need, it will merely relocate people from London and other affluent areas.</p> <p>2. <u>Greenbelt Issues and Merging of towns:</u></p> <p>If this plan were to go ahead, it will mean thousands of houses being built on greenbelt land, including over 400 houses in Northchurch.</p> <p>The CPRE states that "One third of the countryside area in Dacorum Borough is within the Chilterns AONB and that this is a designated protected landscape of national importance, which the Borough Council has a legal duty to protect and enhance. As well as ensuring the protection of the AONB area itself, the Borough Council must also ensure the protection of the setting of the AONB. This is the land outside the boundaries of the AONB where inappropriate development could impact on the special qualities of the AONB, due to its visual intrusion but also due to noise, vehicle traffic and pollution."</p> <p>The CPRE findings are also backed up by the National Planning Policy Framework (NPPF) in sections 13 and 15 as per the details below:</p> <p>1 Development goes against Section 13, relating to Green Belt By definition (point 134)</p> <p>"The Green Belt serves five purposes:</p> <ul style="list-style-type: none"> <li><i>a. to check the unrestricted sprawl of large built-up areas;</i></li> <li><i>b. to prevent neighbouring towns merging into one another;</i></li> <li><i>c. to assist in safeguarding the countryside from encroachment;</i></li> <li><i>d. to preserve the setting and special character of historic towns; and</i></li> <li><i>e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."</i></li> </ul>

The proposed development will mean the sprawl of large built up areas, the merging of Berkhamsted into Northchurch into Tring, it would encroach the on countryside and does not encourage the use of derelict and other urban land as part of the proposal. The proposal does not even recognise Northchurch as a separate entity and is referred to in the plans as West Berkhamsted, clearly a sign of what the future will hold if these plans go ahead.

The NPPF says (in point 143) "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." It then goes on to say in point 144 to say, "When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations." And that, as per point 145 "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt."

Section 15, point 170, which deals with Conserving and enhancing the natural environment states that: "*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes

b) *recognising the intrinsic character and beauty of the countryside*

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;"

The development in question does not take any of these items into consideration and will destroy 850 hectares of Hertfordshire Green Belt land, countryside and urban green spaces.

Due to the massive effect that the coronavirus pandemic has had on businesses, it is very likely that there will be an increased amount of commercial land available in the future years, which could be used for residential use and the plan fails to identify these properly. Therefore, some of the proposed green belt sites are unlikely to be required based on this and therefore the plans need to be amended to take this into account.

### 3. Infrastructure and Road Safety

The development will put a severe strain on a large number of services and does little to identify the improvements required to support the increase in housing. There is already a strain on healthcare services, education facilities and amenities.

Water supplies in the Dacorum area are already under stress, especially during dry summer months according to the CPRE. Present plans do not cover in enough detail new sources of water supply and how it will protect the three designated chalk streams in the borough (the Gade, Bulbourne and Ver). The proposed increase in housing will require substantial investment in infrastructure in order to transport and treat wastewater and sewage. The proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion.

The proposed development sites are located in areas of Berkhamsted where, because of the steep relief lines and landscape of our valley town and, limited of public transport, residents use the car rather than walk or cycle. The sites

put forward in Berkhamsted and Northchurch would only increase car usage and exacerbate already existing problems of congestion and pollution associated to traffic and the council have not put forward an appropriate spend on improving road capacity. I have hugely worrying concerns over the safety for both my children and the routes that they walk to school. The roads are already busy and dangerous have resulted in numerous accidents over the years and there is large support for the local 'Go 20' group before this development has even begun.

4. Environmental Factors:

The density of these homes will also have a huge impact on the wildlife and rare species are likely to totally disappear along with the disappearance of our green areas. The Lockfield Site will mean the loss of a wildlife area which currently acts as a safe transition zone for animals trying to get up to the Ashridge Estate and the loss of the other greenfields put forward for development will mean further loss of the countryside and its landscape. Developments will be built on ancient woodlands and the aesthetics of the whole area will be detrimentally changed.

In addition to these, when the A41 was initially built, a 'Green Lung' was created around it so that people weren't living on top of it, but this plan goes totally against that concept.

To sum up, from my perspective, the whole project will change the nature, landscape and character of the whole district. The reason that we made the decision to move to the area some 14 years ago and have a family in this area was due to its accessibility and location within the countryside. This plan will have a significant negative impact on all residents and will result in the decimation of our countryside. It will in addition have a huge negative on the mental and physical well-being of all residents and wildlife, all for a project, that is not required on a scale of this size and does not have the support of not only the residents but goes against the government's own policies and the advice of so many national bodies.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15472
<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
* <b>Yes</b>	
* <b>No</b>	

<b>The Housing Delivery Strategy comment</b>	SEE ATTACHED RESP
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15481
<b>Person ID</b>	1271381
<b>Full Name</b>	Alison Walker
<b>Organisation Details</b>	Associate Director of Strategic/Large Projects Thakeham Homes
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>As discussed above, the Council's housing requirement must be updated in the light of the revised Standard Methodology (December 2020) to include a requirement for provision of a minimum of 18,414 homes over the Plan period. Additional allocations are therefore likely to be required in order to deliver the 1,818 additional dwellings now required over the Plan</li> <li>Based on the previously proposed housing requirement, the Council had anticipated the supply to be comprised of the following elements:</li> </ul> <p><b>Housing Land Supply 2020 – 2038 as at April 2020</b></p> <p>Number of homes required to be built 16,596</p> <p>Total existing commitments 2,708</p>

Urban Growth Areas

5,638

Grovehill Neighbourhood Plan

200

Windfalls

2,408

Strategic greenfield Growth Areas

5,945

**Total Housing Supply**

**16,899**

**Surplus over housing need figure (16,899 – 16,596)**

**+303**

- As is clear from the above table and the supporting text in the Local Plan, the Council has appropriately sought to prioritise urban sites where possible to meet its identified housing needs. Even using the currently proposed lower housing requirement, it is clear that there will remain a demonstrable need for releases of Green Belt land to meet the Borough's needs. Given the potential capacity from non-Green Belt sites has already been maximised, it is clear that in order to meet the now higher housing requirement, additional Green Belt release will be
- We consider that all references to dwellings numbers save windfalls should be expressed as minimum numbers in the Local Plan. It is important that the Plan includes sufficient flexibility to ensure the minimum housing requirement is met. Rather than the current proposed strategy of relying on windfalls for a significant proportion of the housing requirement, particularly at certain settlements, windfalls should be viewed as providing this flexibility on top of the allocations to ensure minimum housing numbers are
- We note that the Council has assumed delivery of 2,408 dwellings as windfalls over the Plan period, equivalent to 14% of the overall housing supply. This 2,408 windfall figure includes 48 dwellings at Kings Langley. Policy SP26 Delivering Growth in Kings Langley sets out how at least 274 dwellings will be delivered over the plan period. These will be delivered through a combination of known commitments (71 dwellings), strategic allocations (155 dwellings) and windfall sites (48 dwellings).

- Two sites have been proposed for allocation for housing in Kings Langley. KL01 Coniston Road is allocated for around 10 dwellings and KL02 Rectory Farm is proposed as a major urban extension for around 145
- The level of windfall that is being relied upon for Kings Langley is high at 17.5% and significantly higher than in the other large villages; with 10% windfall reliance in Bovington and 11% in Markyate. Berkhamsted and Tring which are much larger settlements each only rely on windfall for 10% and 5% of their housing delivery. While the strategy for Hemel Hempstead does make a windfall allowance of 16%, this is representative of the higher level of opportunity for windfall sites to come forward within this major urban area. Notably the previous Core Strategy only assumed 50 dwellings per annum from windfalls, equivalent to only 12% of the annual requirement.
- Berkhamsted, Tring, Bovington and Markyate are all subject to either and in some cases both Green Belt and AONB designations. The potential for windfall sites is therefore restricted to within the settlement boundaries themselves with development outside unlikely to meet the tests for development in areas subject to these
- In accordance with paragraph 70 of the NPPF if a windfall allowance is included as part of anticipated supply this should be “*realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future*” Given the previous windfall rates of delivery and the requirement for the inclusion of smaller sites in the emerging Local Plan, it is considered insufficient evidence has been provided at this stage to demonstrate they will provide a reliable source of supply.
- The reliance on such a high windfall allowance for Kings Langley indicates that the Council has simply not identified sufficient sites across the Borough to deliver the level of growth aspired in SP2. The Council should therefore be seeking to allocate additional sites at higher tier settlements in accordance with its Spatial Strategy to ensure the deliverability of the Plan so with priority given to the settlements in the order of their inclusion in the settlement hierarchy to ensure the effectiveness of the
- Whilst the current draft Local Plan does identify a supply of 303 dwellings in excess of its minimum requirement, it is considered that this is the minimum contingency. Accordingly provision should be made to allocate sites for development for at least the additional 1,818 homes now required over the Plan period, plus a contingency of a similar level as a minimum. The Council’s currently proposed contingency represents only 1.6% of the overall housing requirement, which given the significant contribution assumed from windfalls is considered to already be minimal and should not be counted towards the requirement for an additional 1,818 dwellings. We similarly support the decision not to place reliance on any contribution which the emerging Bovington and Kings Langley Neighbourhood Plans could make given the significant uncertainties and potential for double counting.

- In seeking to allocate additional sites to meet this additional requirement the Council should accord with its proposed Spatial Strategy and settlement hierarchy to ensure these are delivered in sustainable locations. The requirement for additional development also affords an opportunity to address the current disparity in the treatment of Berkhamsted and Tring in terms of the scale of development proposed. Section Four of this report discusses how our client's site, Bulbourne Cross, can help to meet these

- With regards to Berkhamsted, Policy SP4 provides further details of the development to be provided stating:

*“j. The development of a series of strategic urban extensions on land on the south and western edges of Berkhamsted and up to the A41. These will chiefly be made up of a number of small and large developments to the south and south-west which will deliver around 1,870 homes in total, including land for new primary and secondary schools, and other facilities.”*

- We comment in detail in relation to the proposed distribution of development at Berkhamsted specifically in relation to Policies SP21 and SP22 below and as such do not repeat these comments here. In the light of our recommendations in relation to these policies, changes would also be required to Policy SP4 to reflect the revised distribution of development around the settlement in order to deliver the wider public benefits that our client's site would deliver.

**Included files**

**Title** The Housing Strategy

**ID** EGS15515

**Person ID** 1162394

**Full Name** Grahame Senior

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

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>	The Housing Strategy
<b>ID</b>	EGS15525
<b>Person ID</b>	211488
<b>Full Name</b>	Ms Alison Cockerill
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	<p>I have just read the Local Plan for 2020-2038 and wish to record the following concerns for use in the consultation process, particularly relating to Tring. Thank you.</p> <p>The Foreward to the Plan states that ‘Dacorum will see significant growth and investment over the coming decades, particularly in housing’. Apart from figures supplied by central government there is no further explanation as to why this should be. I would like reassurance that Dacorum Borough Council (DBC) have challenged these figures and will continue to seek a reduction, particularly as there is already a parliamentary discussion taking place to effect severe restrictions on further growth in the southern half of the country.</p> <p>The Foreward notes that the ‘problem’ in South West Herts is unmet need in Watford but there is no suggestion of how these Plan will alleviate the situation unless there is an undisclosed policy of actively trying to move people to other areas of the borough.</p> <p>A large developing in Tring will undoubtedly mainly attract buyers from London, who can then commute back to the capital for work. Tring station has recently been updated to cope with the (pre-covid) demand; as I am sure DBC know, a sizeable percentage are part of the local cross county flow from Buckinghamshire, due to the much slower, less frequent rail service there. There is no detail in the Plan as to how DBC are going to enable further upgrades at the station, nor who will finance them. There is repeated comment within the Plan about encouraging the use of buses, acknowledging that to achieve this ‘modal shift’ will require a change of ‘mind-set’. This is a very naïve hope. There is no comparison between cars and buses for convenience or timing, buses are infrequent, unreliable, uncomfortable and not very clean. They do not provide door-to-door transport, you need to be fit enough to walk to the bus-stop and able to carry any purchases back home. I know I use them! (I do not drive). People who can afford to live in Tring can afford to run a car,</p>

or three in many cases, and this Plan will simply increase local car volume and pollution, a direct contradiction of the 'Overarching Vision'.

The Foreward also mentions easy access to three airports and the M25/M1, once again citing this as a reason to develop housing in Tring, once again encouraging car use and once again increasing noise and pollution. DBC acknowledge these side effects yet continue to purport in their 'Overarching Vision' that their policies 'mitigate and adapt to climate change, and conserve and protect the natural environment'. I don't think so. Incidentally, the Foreward quotes that Luton Airport is 20 minutes from Tring; this is both incorrect and misleading – local taxis allow an hour.

Page 44 of the Plan reports that South West Herts has 188000sqm of office space and will not need any more. So why is office space included in the proposed employment areas-Tr01 and Tr06. A walk along the High Street will demonstrate ample opportunity in all the empty buildings for use as office space should the need arise. There also appears to be no acceptance of the reality of the post covid employment scene—home working will remain the norm, apart from anything else it is much cheaper for the employer. The suggestion that small industrial units/warehousing and possibly a supermarket would be sited on Tr01 raises questions. Land on LA5, the development area on the Icknield Way, included planned space for growth of the industrial site but this has not happened. So why is there any need for further allocations of land for industrial use when the original designation was not required? Having spent 40 years working in the retail sector I am at a loss to understand the comment that the current supermarket (Tesco on London Road) is 'overshopped'. What does 'overshopped' mean? It is not a retail phrase and would therefore imply that this is a lay term used to disguise other issues. Do DBC believe Tesco should have competition, and if so, why; surely it cannot be within a local authorities remit to try and affect a retailers profitability. Or is the suggestion that the footfall is so high the store constitutes a health and safety risk. If so, that should be addressed now, not at some time within the frame of the Plan.

Part 17 of the Foreward says that the Joint Strategic Plan 'will support existing retailing, more leisure, social, town centre living, evening economy' and that 'new developments need access to jobs, shops and services'. The last thing Tring High Street needs is an extension of retail outlets in Brook Street. There are numerous empty properties available now and if investment is forthcoming this is where it needs to be directed. Services are scant, apart from estate agents and hairdressers; there are no banks or travel agents and restaurants were closing long before the pandemic hit. Brook Street has been used before as a venue for retailing, most recently by the Friday market, but it has never been a success. It is simply too far from the main thoroughfare and people will not walk-fact! As for wider shopping needs, most local people use Aylesbury, Leighton Buzzard and Milton Keynes, moving cross county to Buckinghamshire. Hemel Hempstead is rarely a consideration; personally, I can only recall visiting twice in the last twenty years. Aylesbury is also a hub for leisure activities with an excellent theatre and cinema and extensive carparking.

Of major concern on the Plan is the direct lack of responsibility the planning authority – DBC- has for so many aspects of development. There is repeated mention, page 179 22.14 that healthcare is under the control of NHS England and Herts Valleys Clinical Commissioning Group, and page 179 22.21 states that 'developers should engage with the HVCCG to determine the health care requirements associated with new developments'. Really! Builders are to have an input in to how many doctors Tring needs! There is nothing further in the Plan to substantiate any claim of increasing healthcare in Tring, despite DBC envisaging an uplift in the population of up to 50% by 2038. The Plan places huge emphasis on 'wellbeing' as is the modern fashion with Covid 19, and precious little detail on practical improvements to actual medical

care. There is only one doctors practice in Tring, with a pre-covid wait of at least a fortnight for an appointment. There is no longer an NHS clinic in Tring or Berkhamsted, no access to physiotherapy or chiropody. Most people in Tring access the Buckinghamshire hospitals at Stoke Mandeville, Amersham, and High Wycombe. At the time of writing Aylesbury has at least four vaccine centres-Tring and Berkhamsted have none. Stoke Mandeville Hospital has excellent public transport links, Watford hospital has none from Tring. DBC should be campaigning strongly for a new hospital in west Herts and for healthcare provision to be very local. Once again, there is ample scope to place a clinic in Tring High Street.

Also not DBC's responsibility is education, despite claiming in item 23.145 that Tr01 'will include a primary school' and in item 23.147 'there is a need for two primary schools and a secondary school'. The report states that HCC are now responsible for less than half of the county's schools, so who is expected to provide the extra education facilities, and where is the financial base for this. Once again, there is no data to support these claims. Many children from Tring already cross county for schooling in Aylesbury; DBC need to take on board that Tring's natural established links are with Buckinghamshire, particularly Aylesbury.

The Joint Strategic Plan, Page 12, 2.5, quotes 'new homes and developments will acknowledge local character and context'. The Overarching Vision page 26 claims 'to protect and enhance Dacorum's distinctive historic environment'. The Design Outcome and Principles on page 153 will 'reinforce local character-noting height, volume, shape, orientation, siting, layout, landscaping'- and notes at 20.54 'the importance of history to a place's character'. New developments must make a positive contribution'. These claims, for that is all they are, have not been employed at LA5, where the construction is overheight, visually intrusive and cramped. The building contractors openly admit the site is not in keeping with the local area. What control and input will DBC offer Tring residents to ensure a degree of control over any future growth of the town. Where are the measures to protect the established built environment -one of the suggestions from Tr06 is to remove the Local History Museum, currently located to great effect in the only remaining building from the time of the livestock market. How does DBC reconcile that to 'the importance of history to a place's character'. The museum building should be preserved without question. In any development the boundary properties should be well spaced and the properties of low elevation to minimise their visual impact. The introduction to the Plan anticipates a growing number of elderly people, providing bungalows to allow them to remain independent would be a good start for any new builds.

Should building proceed at Tr01 I can find no mention of an alternative living being offered to the farmers at Dunsley Farm; where are DBC proposing they move to, to continue farming, as this country strives to become food sufficient post Brexit.

But perhaps the greatest concern in this Plan is the huge environmental damage that will occur. There is a list of consultative bodies in the introduction, but once again Bucks County Council are omitted, despite the Green Belt and Chilterns AONB and SAC crossing the county boundary within yards of Tring. There are numerous references to protecting the environment throughout the Plan. For example, from page 114, 18.5 onwards- local authorities have a legal duty to the environment under NPPF 'to conserve and enhance the natural environments and protect them from harm', there must be 'regard to the conservation of biodiversity in exercising all their functions'; 'ancient woodland and trees accorded the same level of importance as SSSI- a national priority under the UK Biodiversity Action Plan'. Further on, page 317 recognises 'the existing and historic field boundary pattern' and 'it's existing and future potential as a strategic wildlife

corridor wildlife' at Tr01 Dunsley Farm. Tr03 has 'a historic field pattern, complex topography, well established internal and external hedgerows, a strong scenic quality, intact nature, and tree lined skylines'. DBC accept that there will be 'likely significant effects from Dacorum's planned growth to Ashridge SSSI and Tring Woodlands from the pressure of people and pollution'. And the solution appears to rest with the National Trust to deal with it. All the growth detailed in the Plan is completely contradictory to the stated aims in the Overarching Vision and will contravene every aspect of the quoted environmental protection DBC are supposedly taking into account. It is totally unacceptable and irresponsible to proceed with a Plan which causes such unmitigated damage to the environment.

There is nothing in the Dacorum Local Plan that will benefit or enhance Tring. There are very few substantiated facts and no benchmarking measures. All of it is in direct conflict with the Overarching Vision, which can only lead to the sad conclusion that the vision is pure P.R., an empty document that any local authority in the country could use. Tring and Dacorum deserve better.

**Included files**

**Title** The Housing Strategy

**ID** EGS15565

**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

**The Housing Delivery Strategy comment**

Minimum Housing Need

The Council have made an error in setting out a housing requirement based on the application of the Standard Methodology published for consultation by the Government in August 2020. As the Council will be aware, since the publication of the

draft Local Plan, it has been confirmed that the methodology set out in the August 2020 consultation will not be adopted and instead the previous methodology will be utilised, but with an uplift for the largest urban areas.

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 draft Development Strategy to 2038 catering for a minimum of 16,595 instead of the required 18,414 homes. This equates to a shortfall of some 1,819 homes. This is a significant shortfall which will have to be rectified prior to the pre-submission version of the Local Plan being published for consultation.

#### Future methodology changes

The Standard Method 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.

Although we are not aware of any further changes to be introduced prior to the preparation of the pre- submission version of the Local Plan, it will be important that the Council does not pre-empt the formal introduction of any revision or new standards and works to the methodology in place at the time the plan is prepared.

#### Unmet need from elsewhere

It is acknowledged that the Local Plan is seeking to meet Dacorum's housing need within the Borough boundary, which is laudable. However, it will also be important that consideration is given to the need to meet unmet needs from neighbouring authorities, even if the Council do not feel it is possible for the area to absorb 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 up further.

In particular, the area's strong links with London, with increasing migration over the last 10 years, mean Dacorum is likely to be affected by the inability of London to meet its 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 making an allowance to meet London’s unmet 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 methodology for establishing the minimum housing need, the development strategy in the draft Local Plan will already fail to deliver the level of housing required in the area.

In addition to this shortfall of some 1,819 homes, the development strategy also builds in insufficient flexibility and contingency on the land supply side for the Local Plan to be considered robust. Currently, the Local Plan includes just a 2% buffer in land supply (303 homes – paragraph 7.128 of the draft Local Plan). 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 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 target of 430 and recent delivery rates averaging around 544 homes over the last three years. This suggests the need for a buffer nearer 20%.

The implication of a 10% buffer on top of the minimum housing need of 18,414 is that the 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 to be robust.

This is a significant shortfall which can only be rectified by the additional sites being identified across the Borough for allocation.

The second part of the 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 land supply 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 Markyate falls into this category.

<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15572
<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>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>• Policy SP4 is fundamentally flawed as the housing requirement figures set out are not based on the Governments standard method approach, but rather on proposed revisions issued for consultation and which have now been abandoned.</li> <li>• In the interests of the soundness of the Plan, it is recommended that Policy SP4 needs to make provision for 18,414 dwellings and increase the figure by 1,818 dwellings (an additional 101 dpa).</li> <li>• 1 i) should also be amended to include for greater housing numbers at Hemel Hempstead. The additional dwellings should be allocated at Hemel Hempstead given it is the strategic settlement of the Borough and the most sustainable location in the settlement hierarchy (see our further comments in Sections 4, 5 and 6) of these representations.</li> <li>• Land at Shendish should be specifically identified as a location for growth in Hemel Hempstead at 1 i).</li> <li>• Paragraph 7.20 indicates that any formal phasing of sites has been avoided due to the sheer scale of housing that is required to be delivered. While it is helpful to allow sites to come forward freely, there is a danger that due to the issues set out in section 5 of these representations, that the step change required to deliver the corrected housing figures cannot be achieved, particularly in the early part of the Plan period, given the reliance on large strategic sites with complex infrastructure requirements.</li> <li>• This section sets out W Lamb Ltd's position regarding the housing supply position and implications for addressing the shortfall in housing numbers set out in section</li> <li>• The Housing Policy Topic Paper (November 2020) sets out the Council's analysis in relation to housing supply and delivery, in Section</li> <li>• At paragraph 18 it is acknowledged that:</li> </ul>

*“The Council is committed to meeting its local housing need, but it is very evident that the draft Plan will have to herald a major uplift in delivery compared to historic rates of growth (see the discussion under chapter 4). On this point, the Growth and Infrastructure Strategy recognises the scale of the challenge:*

*“Whilst our new Local Plan will determine the appropriate level of growth, the evidence points towards a considerable step-change in the amount of development, which ranges from between a doubling to a trebling of what the Borough has been used to over the past 20 years or so.”*

- Our key concern is that the consultation document does not put forward a spatial strategy or a housing supply that is capable of meeting the number of homes required, despite *‘being committed to meeting its local housing need’*.
- We expressed concern in the previous section that this consultation document does not use the current standard method for determining housing need as required by paragraph 60 of the NPPF and, as a result, proposes 1,818 homes (101 p.a.) less than needed. In consequence, the Draft Plan does not have a spatial strategy or housing supply capable of meeting the number of homes required over the Plan period and cannot demonstrate a 5 year land supply when this is based, as it must be, on the standard method
- Consequently, the housing supply analysis in the Housing Policy Topic Paper particularly regarding the initial five years of the plan (set out in table 7.9, 7.10, 7.11 and 7.12) does not in our view provide an appropriate response to the required considerable step change in housing
- It is shown that for the period 2022 (assumed adoption of plan) to 2026 that the Council’s five year supply position will be 5.1 years where an annual target of 992 dwellings is adopted and a 5% buffer is applied (Table 7.10). With larger buffers (+10% and + 20%) a five year supply cannot be
- However as we have highlighted already the housing need is 1,023 dwellings per annum and if this target is used a five year supply cannot be demonstrated as illustrated in our recalculation of Table 7.10 below.

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### **Boyer Recalculation of Table 7.10: 5-year housing supply as at 1st April 2022 (5% buffer)**

Shortfall 2020-22:

(2 years x **1,023**) – projected completions 2020/2022 2,046 - 1,690

356

5 year requirement for 2022 – 2026:

unadjusted housing target (**1,023** x 5) + shortfall (**356**) = 5,115 + 356 = **5,471**

Plus 5% buffer brought forward from later in plan period (5% of 4,610) = 231

5,702

Annual adjusted 5 year requirement (**5,702 / 5**)

1,141

Projected supply 2022/23 - 2025/26

5,078

No. of years supply (5,078 / **1,141**)

#### **4.45 years**

- Being unable to demonstrate a five year housing land supply, with buffer, in the early term of the theoretically adopted Local Plan and with an accumulating shortfall which will require very significant acceleration in subsequent years to catch up, we do not consider the Council's position on housing supply is robust. In order to have a realistic chance of meeting housing needs within the Borough, it is clear that additional sites and land for housing must be
- The latest statistics on housing supply published by the Ministry of Housing, Communities & Local Government at a local authority level (Table 122) shows that for Dacorum, over the last 10 years (2010-2020), the average annual delivery (net additional dwellings) was 500. Over a longer time frame that the statistics have been available (from 2001), that average annual delivery of net additional dwellings was 486.
- Across the years, there have been fluctuations in the number of dwellings delivered with the lowest annual number being in 2013-2014 at just 210 dwellings with the highest being in 2002-2003 when 745 net additional dwellings were
- The stacked bar chart below shows the historic delivery year by year (lower red colored portion of bar) compared to the proposed housing target in the new Local Plan of 922dpa. This graph illustrates the extent to which historic completions are below the level now required (upper gold colour) compared to the proposed

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- The average shortfall across the last 10 years was 422 units per year and the difference over the longer timeframe of 19 years compared to the proposed target is 436 units per
- Where the correct target is applied, the historic levels of shortfall are even starker and this raises very significant doubts around the likelihood of housing delivery rates being accelerated and then maintained in the short and medium

- The latest Housing Delivery Test results mirror this track record of under delivery by DBC with the previous 3 years only achieving 89% of the target (triggering an Action Plan), with a declining rate of new homes being completed each year (2017/18: 587, 2018/19: 576 and 2019/2020: 522). It is therefore considered, that it would be justified to Plan for a higher than 5% buffer of at least 10% and potentially 20% is justified and should be planned
- Particularly, given that the total housing supply identified in the Draft Plan (Table 2 Sources of Housing Land Supply) suggests that over the Plan period the supply figure is 16,899, which is only 2% higher than target of 16,596 and is clearly considerably lower than 18,414 standard method figure for the Plan period, without any
- We consider the housing trajectory set out on page 38 of the consultation document, to be wholly unrealistic. It suggests that completions will rise from their historic long term average of 486 p.a. (or 500 p.a. over the last 10 years) to 1,036 in the next 12 month monitoring period (2021/22), which is an increase of over 100%. This is impossible to achieve for the following reasons:

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- Judging by the timeline presented on page 8 of the consultation document, the Plan is unlikely to be adopted before late 2022. It is not therefore possible for sites proposed in the Plan to be brought forward and to contribute to new home completions in 2021/22 before they are properly considered and confirmed as allocations through the statutory
- Even after the Plan has progressed to examination and adoption, there is a lead time for the delivery of first completions on sites proposed in the Plan which can be considerable for strategic sites. This means that sites allocated in the Plan are at best only likely to come forward towards the end of the first 5 year period making it impossible to deliver 4,858 homes over the 2021/22 to 2025/6 period (an average of 971 completions a.).
  - The Plan must therefore set out a more realistic trajectory for sites proposed in the Plan, that takes account of:
    - The time needed to complete, examine and adopt the Plan;
    - The lead time for developers to secure outline planning permission (including to complete S106 agreements), discharge conditions and obtain reserved matters approvals;
    - Site preparation and provision of essential infrastructure; and
    - The construction period.
- It will clearly be a challenge to increase house building rates in the short term to the level required to meet the housing needs identified by the current standard method. The Plan must provide an effective response to that challenge by identifying a housing supply that can be implemented as soon as possible, characterized by sites capable of early

- We are concerned that windfall sites are relied upon for a significant component of housing supply at 2,408 over the Plan period (134pa) amounting to nearly 15% of all supply. This is an unusually high percentage reliance on windfall sites and it should be recognized that the NPPF (para 70) requires “*compelling evidence that they (windfalls) will provide a reliable source of supply*”.
- The housing supply proposed in Table 2 of the consultation document relies heavily on urban growth areas (33% of supply) and strategic greenfield growth areas (35% of supply).

- Large urban extensions are associated with long lead-in times. This is recognised at NPPF paragraph 72(d), which states that, in proposing major urban expansions or new settlements, LPA’s must:

*“Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)”.*

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- Large strategic allocations are complex and, particularly where associated with significant infrastructure requirements, are often associated with significant lead-in times (as demonstrated in the Start-to-Finish report by Lichfields – second edition February 2020).
  - It is clear to us that Dacorum needs to demonstrate that the new Local Plan will show much improved housing delivery rates than are recorded historically. On the basis of the available evidence from the Lichfields report quoted above, and from other sources on lead times and delivery, the Plan must provide greater diversity in its housing supply. This should include a greater number of smaller sites at existing settlements of 500 units or less for which lead in times are shorter and delivery rates higher, as well as major new strategic allocations with significant or complex infrastructure
  - We also consider that the Plan strategy must allow for a wider range of smaller sites from additional locations to supplement key strategic allocations in delivering a diverse range of housing in
  - The requirement to increase housing supply in Dacorum to meet the level of housing need set by the current standard method, and to improve the deliverability of that supply, requires additional sites that meet the requirement for early delivery. This should include significant additional releases of smaller scale Green Belt sites without complex and costly infrastructure
- 
- The Draft Local Plan needs to make up for the shortfall of 1,818 dwellings over the Plan period to address the Standard Method
  - In addition, the identified supply of land for new housing relies upon a number of large strategic sites and very high densities on urban sites. There are risks associated with this approach, which may mean that the Plan is not able

to meet identified needs. In this respect, the Plan needs to have regard to the requirements of NPPF paragraph 73;

*“Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period”.*

- To help mitigate the risk of under-delivery, it is essential that the Plan facilitates a diversity of housing supply and is sufficiently flexible, such that it is effective at meeting housing needs in the short, medium and long-term. Below we examine the main sources of supply identified in the Draft Local
- Hemel Hempstead rightly forms the focus for new housing development in the Emerging Strategy for Growth as it is Dacorum’s largest and most sustainable settlement. It should therefore be the principal focus for providing the further 1,818 dwellings required by the current standard method (as detailed above).

#### Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

- It is therefore clear that additional allocations are necessary at Hemel Hempstead but, as indicated above, it is also necessary to consider whether there is sufficient diversity and choice in the identified supply at Hemel Hempstead and whether that supply is deliverable.
- There are three major strategic allocations proposed in the consultation document: at North Hemel Hempstead (1,550 dwellings in the Plan Period); West Hemel Hempstead (1,150 dwellings) and Marchmont Farm (385 dwellings). Together these contribute 3,085 dwellings to the total of 10,668 proposed at the town (29% of that total).
- However, of these three strategic allocations, North Hemel Hempstead and Marchmont Farm adjoin each other and are essentially in the same location. There are therefore only 2 directions / locations for outward growth. These are major strategic growth locations with substantial infrastructure requirements that have long planning lead times before first completions and limited build out rates (as demonstrated by the Lichfields report referred to above).
- We do not object to the principle of the North Hemel Growth Area (HH01), but the requirement for a strategic corridor route between Leighton Buzzard Road and Redbourn Road (via land in St Albans City and District Council) will be costly and complex to deliver and will, as a result, delay house completions and the rate of delivery on the
- Other requirements to deliver a new country park of district wide importance and both primary and secondary schools and a local centre add to the overall infrastructure burden and lead times for the development. Further, the requirement to achieve a 60% share of sustainable transport modes by 2050 on the site is costly and difficult to achieve without existing public transport

- The North Hemel Growth Area Phase Two is identified as a reserve site post 2038. Given the level of infrastructure required to support Phase One, let alone the 4,000 dwellings planned for Phase Two (HH 02), there are no realistic prospects of bringing that site forward into this Plan period to meet the shortfall that has been identified.
- Other strategic allocations provide in total some 4,020 dwellings but are predominantly on town centre and urban / regeneration sites within Hemel Hempstead where there are concerns about deliverability and speed of delivery, particularly given that the densities have been significantly increased on a number of these that have been rolled over from the adopted Local Plan, which area still to be developed despite having been allocated
- For example, the redevelopment of the Hemel hospital site (HH 03) to deliver 450 dwellings as well as a new primary school, and the consolidation of existing healthcare provision, requires a complex masterplanning process to reconcile and accommodate these In this context the capacity and delivery of the site is likely to be subject to delay and uncertainty.

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- We consider one or more sites / directions for growth involving Green Belt are necessary at a smaller scale to both meet housing need and add diversity and greater deliverability to the Plan's proposed housing supply, to be located at Hemel Hempstead as the most sustainable location in the
- Given the strategic level of growth planned in the Market Towns of Berkhamsted and Tring and the significant levels of infrastructure required to deliver that growth, it is considered that neither of these locations could accommodate any further development, to address the Plan's shortfall, particularly given the long lead in times referred to
- Growth at Berkhamsted is planned for 2,236 dwellings in the Plan period, with South Berkhamsted delivering 850 (1000) units with a community hub, primary school, district heating system and 500 units at West Berkhamsted with primary school, secondary school and district heating system. Both growth areas are to be brought forward as a comprehensively planned urban extensions in accordance with a Masterplan led approach to be adopted in two separate SDP's. A process which is likely to take some time to progress through planning, design and consultation prior to any reserve matter stage applications being made, with associated implications on lead in
- In addition, the Plan acknowledges at paragraph 23.102 that 'growth will be transport / accessibility and infrastructure led and be chiefly brought forward as larger releases to help deliver these'. The Berkhamsted and Tring Transport Strategy identifies a number of measures to be implemented, while a site for a new secondary school has yet to be fully secured and the existing school is already at capacity, necessitating delivery aligned to housing
- At Tring, growth in urban extensions accommodating 2,200 (2,730 in total) dwellings will also be sustainable transport / accessibility and infrastructure led and be chiefly brought forward as larger releases to help deliver

these, with new development needing to contribute towards increasing capacity/upgrading of local infrastructure (paragraph 139).

- East of Tring (1,800 units) is required to bring forward a primary school, a secondary school, a new sporting and leisure hub and SANG while South East Tring (400 units) will need to bring forward a primary school, employment land, new retail provision and SANG. Both sites will have a masterplan adopted as SPD as at Berkhamsted, with the associated implications for lead in and delivery within the Plan
- In addressing the Plan’s short fall of 1,818 dwellings over the Plan period, the assessment of growth planned at Berkhamsted and Tring and the associated lead in times to deliver the required infrastructure, further reinforces the need to focus on Hemel Hempstead as the ‘Strategic Settlement’ in line with SP3 The Settlement

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

- We reiterate that one or more sites / directions for growth involving Green Belt are necessary at a smaller scale to both meet housing need and add diversity and greater deliverability to the Plan’s proposed housing supply.

**Included files**

**Title** The Housing Strategy

**ID** EGS15604

**Person ID** 1271748

**Full Name** Ms Gosia Turczyn

**Organisation Details** Wigginton Parish Clerk  
Wigginton Parish Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment** Wigginton Parish Council objects to this policy only because it fails to deal with the need to provide dwellings suitable for home working despite the very large numbers of people working from home due to the pandemic. Some employers

have already made this a permanent change and the widely accepted expectation is that many more will do so once some of the present shortcomings can be overcome with better communication and IT systems etc.

**Included files**

**Title** The Housing Strategy

**ID** EGS15608

**Person ID** 1271748

**Full Name** Ms Gosia Turczyn

**Organisation Details** Wigginton Parish Clerk  
Wigginton Parish Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Housing Delivery Strategy comment**

The WPC fully supports the principles behind the Dacorum Settlement Hierarchy but objects to the failure to follow this through by guiding development accordingly.

Policy SP4 shows that the plan is for 5500 new homes in Hemel Hempstead (Population about 95 thousand), 1870 in Berkhamsted (Population about 21 thousand) and 2200 in Tring (Population about 12 thousand)

The average household has 2.37 people according to the ONS figure for 2019. Hence the increase in homes is only about 14% in Hemel Hempstead but 21% in Berkhamsted and a massive 43 % in Tring, based on the figures in SP4. This is completely inconsistent with the overall strategy of the Dacorum Settlement Hierarchy which is primarily based on population size. Hence the largest increase should be in Hemel Hempstead which is "the focus for the majority of development" according to Dacorum Policy SP3. This is followed by Berkhamsted and then Tring, so the allocation of new homes is **the exact opposite of the Dacorum Settlement Hierarchy policy**

The Settlement Hierarchy policy also expects any new housing in rural areas to be concentrated in villages rather than the open countryside. However, the evidence that the new Local Plan is based on suggests that this policy has completely failed in the past. Appendix C (Historic Windfall Data) of the Urban Capacity Study shows that over the 2006 to 2020

period the number of houses built within village envelopes is significantly lower than those built in the surrounding countryside. Under Policy CS6, for example, 3 new houses were built within the Wigginton village envelope but 11 were built elsewhere in the parish. The same applies under Policy CS5 where in Aldbury there were none at all within the envelope, but 14 elsewhere in the parish. Furthermore, this inconsistency will be made even worse with the adoption of the more restrictive policy DM39

Another inconsistency with Dacorum and also with national policy is that new development should avoid the loss of Green Belt land. It is particularly important that Areas of Outstanding Natural Beauty such as the Chilterns AONB should be protected from development. Whilst Dacorum has a large percentage of Green Belt land, it does have a significant area outside the Green Belt which should have been given more consideration than it seems to have been. Furthermore, whilst any extension of the three main towns is likely to encroach the Green Belt, that around Hemel Hempstead is not in the Chilterns AONB unlike Barkhamsted and Tring which are both surrounded by it.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15611
<b>Person ID</b>	1271748
<b>Full Name</b>	Ms Gosia Turczyn
<b>Organisation Details</b>	Wigginton Parish Clerk Wigginton Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Housing Delivery Strategy comment</b>	Section 7 The Housing Strategy  The exceptionally large Government target for new homes has seemingly given Strategic Planning an almost impossible task because of the high proportion of Green Belt land within the borough. It is also one of the few local authorities that has a significant amount of land designated as AONB, the boundaries of which it has no authority to change.

The allocation of sites for housing was mainly based on the assessments of sites put forward by developers, landowners and agents under the 'Call for Sites' exercise. Whilst this procedure has previously given sufficient scope to achieve housing targets whilst properly respecting major constraints, it has failed to do so this time against such an exceptional increase. This ought to have been apparent at the start and much more effort should have been made then to identify all possibilities, not just those from the traditional 'call for sites'. It seems that a belated effort was made to do this and two large but currently unavailable sites were identified outside the Green Belt and the AONB with one on previously developed land. There does not however appear to be any evidence that a thorough search has been made and that there are no other such sites that might be available. The WPC suggests that the plan is not well founded unless such evidence can be provided.

On the 16th December 2020 the Government published several documents detailing changes to their housing policy. These consisted of their response to the local housing need proposals in "Changes to the current planning system", a new higher indicative local housing figure for Dacorum of 1023 per annum and a written ministerial statement.

The annual increase in the indicative figure has resulted in an increase of 1818 new homes for Dacorum above those used as a basis for the consultation.

This new Government guidance has a significant impact on the Dacorum Local Plan making it now out of date and could therefore be considered unsound if not revised before submission.

Another specific outcome is a requirement for a 35% increase in housing plans for the 20 largest cities in England in order to meet the 300,000 national target. This underlines the policy to concentrate housing on larger towns and cities and places more emphasis on avoiding harm to Green Belts and protected landscapes such as AONBs. "We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places" and "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"

The Government response also refers to the NPPF in regard to the number of houses "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."

Paragraph 11b of the NPPF makes it clear that policies should provide for housing needs unless: "the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area" Assets of "particular importance" include Green Belt land and Areas of Outstanding Natural Beauty

The ministerial written statement also says that " 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 journeys."

For the Dacorum Local plan this ought to mainly mean around Hemel Hempstead station and in fact that station is identified in the plan for further development. However more work ought to have been done to identify land for more homes in that area. Whilst that might mean using some Green Belt land it is some distance from the AONB which is of much greater importance.

<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15638
<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>The Housing Delivery Strategy comment</b>	<ul style="list-style-type: none"> <li>As set out above, the local housing need for Dacorum Borough, as at December 2020, is 1,023dpa. In this context, and in order to deliver and address housing need in full, as the draft Plan identifies in the intention for DBC, we recommend the amendment of Policy SP4 to refer to a minimum of 18,414 new homes being provided over the plan</li> <li>It is vital that DBC plan to deliver, as a minimum, their housing need in full so that the objectives noted in paragraph 2 of the Plan can be realised and the Plan is consistent with paragraphs 11 and 59 of the NPPF.</li> <li>As recognised in paragraph 4 of the Plan, the Borough's high average house prices mean that home ownership is increasingly unaffordable for many households and out of reach for the majority of young people with the average age of house purchase currently being 32 years old. To assist in addressing this and in order to meet economic</li> </ul>

and employment growth targets DBC must significantly increase the number of affordable homes through the delivery of their housing need in full.

- In addition, and in accordance with paragraph 60 of the NPPF, needs that cannot be met within neighbouring areas, as established through ongoing discussions with authorities in the Housing Market Area, should also be taken into account to determine the minimum amount of housing to be planned
- In the context of ensuring needs are met in full, we recommend that a windfall allowance should only be included in the housing supply if there is robust and compelling evidence that the assumed supply will be realised (as is set out in paragraph 70 of the NPPF). We welcome the approach taken by DBC in respect of calculating the assumed supply based on historic delivery rates, however we recommend further consideration is given to whether historic rates of windfall are likely to continue given the identification of available urban sites as site allocations, the capacity identified in the Urban Capacity Study and the limited availability of alternative suitable non-Green Belt
- To provide clarity on deliverability, a more detailed trajectory setting out delivery rates for proposed site allocations should be This would be consistent with paragraph 73 of the NPPF.
- Moreover, to ensure that housing need is addressed in full, sufficient supply must be identified to ensure that need is met even if unexpected delays are The acknowledgement of this in paragraphs 7.18-25 of the Plan is welcomed.
- To this end, we support DBC in seeking to deliver sites to exceed the housing requirement across the plan
- We support the identification of larger strategic Growth Areas in the Plan which offer the potential for comprehensive development, the delivery of significant infrastructure benefits and opportunities to secure a range of housing types and tenures through delivery at It is recognised that the West Berkhamsted Growth Area comprises three medium to smaller independent land parcels within the control of three individual developers Growth Areas Bk05, Bk06 and Bk08. This combination offers not only the benefit of providing development at scale to support the delivery of infrastructure but also helps to provide the prospect of a faster and more flexible delivery trajectory than Growth Areas under a single ownership to bolster delivery in the early years of the Plan

and ensure the Council will have a strong five year land supply on adoption and during this period.

- As discussed in detail in Section 6 of these representations, we support the proposed approach to development at Berkhamsted and consider it is appropriate given the evident sustainability of the In this regard, we support part 1j of Policy SP4 which notes that a series of strategic urban extensions on land on the south and western edges of Berkhamsted and up to the A41 will deliver around 1,870 homes in total.

**Included files**

**Title** The Housing Strategy

**ID** EGS15668

**Person ID** 1272282

**Full Name** Plato Estates

**Organisation Details** c/o DLP Planning

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

- The third bullet point listed in paragraph 2 of the draft Local Plan refers to paragraph 61 of the NPPF, which requires that planning authorities “*should assess and reflect in planning policies the size, type and tenure of housing needed for different groups in the community*”.
- Paragraph 7.4 goes on to state:

*“The South West Hertfordshire Local Housing Needs Assessment not only identified the overall local housing need for the Borough, but also the needs of different sectors*

*of the community including for affordable housing, housing mix, and specialist accommodation. Therefore, **in addition to the overall housing target, this Plan supports new bed-spaces to help meet the accommodation needs of older people needing residential or nursing care.**”* (emphasis added)

- We further note that paragraph 2 of Policy SP4 states:

*“The housing strategy will support, in accordance with the Local Housing Needs Assessment and other studies, the provision of a mix of housing tenures, types and sizes of homes, plots for self-build and custom housing, and specialist accommodation to meet the needs for care in the community and an ageing population.”*

- However, we object to the Housing Strategy outlined in Policy SP4 on the grounds that it does not plan positively to meet these identified specialist accommodation needs as they are dealt with separately to the overall housing target and there does not appear to be a clear strategy for delivering these specialist forms of accommodation,

including residential or nursing care beds, through the Local The Local Housing Needs Assessment identifies a need for 1,019 additional care home bedspaces in Dacorum Borough by 2036 (the highest requirement of all South West Hertfordshire authorities), and the report prepared by DLP Planning (attached at Appendix 1) identifies a need for 1,348 additional care home bedspaces by 2036, yet no specific sites have been allocated within the Plan for these forms of accommodation. The Plan is therefore not currently in accordance with paragraph 35 of the NPPF as it has not been positively prepared as it fails to identify and allocate deliverable sites for specialist forms of accommodation.

- In line with our above comments in respect of Policy SP3, we believe that the wording of paragraph 1(g) of Policy SP4 should be amended as follows:

*“The development of small-scale sites within the ~~selected~~ small villages in accordance with relevant countryside policies in this Plan”*

- This will ensure that limited development required to sustain rural communities and meet local needs will be able to come forward on suitable sites within all small villages in accordance with NPPF paragraph 78.

**Included files**

**Title** The Housing Strategy

**ID** EGS15688

**Person ID** 1207333

**Full Name** Growth Team

**Organisation Details** Growth team  
Hertfordshire County Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Housing Delivery Strategy comment**

Appendix 2: Care Home Requirements

These requirements are from HCC’s General Home Design Brief and the county council’s objectives for the Little Furze build.

- Location of homes central in community
- 0.6ha – 0.9ha (1½-2.2 acres)
- Preferably flat site.

- Care home should be part of community e.g. café (facilities to be provided e.g. hairdresser, bar, library, chapel etc).
- Design for future i.e. 30 years hence
- Meet & greet – reception welcoming
- Reception area to open onto “plaza” area, with linkable multi use spaces to form single event space
- 15 bed unit segmented into 7 & 8 but with staff working as a unit
- Quality finish with homely layout & feel
- Natural lighting & windows to be maximised
- Flexibility to respond to changing needs of users
- BREEAM excellent/very good to provide environmental credentials and reduce carbon footprint
- Care Home – 75 beds over 2 floors
- Laundry/kitchen on ground floor
- 15 bed units split into a 7 & an 8 by a pair of joined lounge/diners
- Floor area – 55 - 58m<sup>2</sup>/bed – overall floor areas to be 4,500m<sup>2</sup> approx.
- Care configuration – 60No. nursing/dementia nursing, 15No. intermediate care
- Ancillary IMC accommodation to include:
  - o Therapy
  - o Meeting room
  - o Office
  - o Clinical room
  - o Drugs room
- Design to be based on Dementia best practice i.e., ‘Dementia Enabling Environments’
- Provide 75 bed care home with accommodation and ancillary accommodation over 2+ floors
- Intermediate or step up/step down facility to be provided
- Preferably provision of 2No. People Plus rooms fully integrated into Ground Floor accommodation
- Provide flexible environment for provision of quality care over 60 years
- Building to be contemporary in appearance while reflective of setting
- Access to quiet areas for all residents
- Access to internal activity areas for all residents
- Accessible kitchenettes in all dining rooms
- Accessible external activities areas for all residents
- Building to enable the progression of life care for residents
- Community uses to be embraced – bowls etc
- Innovation in design, enabling excellent care
- Climate change agenda to be addressed

**Included files**

**Title**

The Housing Strategy

**ID**

EGS15710

<b>Person ID</b>	1273151
<b>Full Name</b>	Ms Megan Green
<b>Organisation Details</b>	Senior Planner Thakeham Homes Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Housing Delivery Strategy comment</b>	<p>As discussed above, the Council's housing requirement must be updated in the light of the revised Standard Methodology (December 2020) to include a requirement for provision of a minimum of 18,414 homes over the Plan period. Additional allocations are therefore likely to be required in order to deliver the 1,818 additional dwellings now required over the Plan period.</p> <p>We consider that all references to dwellings numbers, save windfalls, should be expressed as minimum numbers in the Local Plan. It is important that the Plan includes sufficient flexibility to ensure the minimum housing requirement is met. Rather than the current proposed strategy of relying on windfalls for a significant proportion of the housing requirement, particularly at certain settlements, windfalls should instead be viewed as providing this flexibility <i>on top of</i> the Local Plan allocations. This alternative and more dynamic approach would ensure minimum housing numbers across the whole Borough are met.</p> <p>As set out in comments regarding Policies SP2 and SP4 above, Thakeham considers that additional housing sites need to be identified in the Borough and proposes that Fox Meadow in Bovingdon provides a suitable additional site in line with the Vision and Delivery Strategy for the village. Notwithstanding that, should the Council believe it unnecessary to allocate additional land, Thakeham raises serious concerns with the current draft allocations and will show that the site at Fox Meadow offers a preferable alternative.</p>
<b>Included files</b>	
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15753
<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	
<b>The Housing Delivery Strategy comment</b>	<p><b>Table 2</b> [P37] shows 5945 houses being built on ‘Strategic greenfield Growth Areas’ viz Green Belt of which around 1870 are allocated to Berkhamsted. We have questioned whether these can be considered ‘sustainable sites’; the further critical issue is whether it is desirable to impose 20% plus growth on the locality that already has severe infrastructure limitations as well as being constrained by proximity to AONB, Beechwood SAC etc.</p> <p>This Council Notes, but in so far as it applies to Berkhamsted, does not endorse, SP4 – Delivering the Housing strategy</p>
<b>Included files</b>	<a href="#">STAT - Berkhamsted Town Council - Draft Local Plan_BTC response_vfinalB.pdf</a>
<b>Title</b>	The Housing Strategy
<b>ID</b>	EGS15776
<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	
<b>The Housing Delivery Strategy comment</b>	<p><b>Wider context</b></p> <p>This paper focuses mainly on the transport need of housing for sale, not rent. However, many of the issues apply to social housing as well as private housing. However, the choices facing people who cannot afford a car, can be different. They are forced to use public transport. But their need for good public transport are often greater.</p> <p>Everyone’s quality of life is determined by the income they can obtain, less the cost of</p>

housing and the cost of travel between housing and work.

If you are on a low income, dependent on social housing, but your social housing is too far from your work, you will probably end up on benefits. Or you will spend so much of your time and money travelling to and from work, so as to destroy your quality of life. In which case why bother to work?

**Included files**

## 8 The Employment Strategy responses

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9
<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>The Employment Strategy comment</b>	This plan does not take into account changes wrought by the virus. Shops are closing so why would you think you can magic up people who want to open shops? The only ones you will attract are the big supermarkets - and that is also a big change. More peopel buying online - does that ring a bell? You are craeting a plan for a future we thought was coming but has now changed fundamentally. try keeping up and drop these ridiculous ideas. peopel won't open shops and businesses just because you say there are buildings. It doesn't work that way. I talk from a position of experience as I am a retail CEO - well ex now as the world has changed
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS43
<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>The Employment Strategy comment</b>	As good as looking at the development plan from section 3. I saw very small dark blue areas. With regards to using land in Tring and Bourne end next to the A41 for industrial and business use is a very positive logistical one. With regards to the section 8.13 regarding land shortage is there any thoughts of using the land either side of the motorway encompassed by the A414, including Hogg's End lane up to Punch bowl lane. But all this planning will only be of any benefit , if companies and buisnesses want to set up in Dacorum. The rentable rates will have to be competitive.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS77
<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>The Employment Strategy comment</b>	The Strategy refers to co-ordination with other South west Hertfordshire authorities. What about Bucks? The A41 reverts to single lane carriageway at Aston Clinton and has significant traffic delays into Aylesbury and beyond. What are the current plans for the A41 to bypass Aylesbury ? That will have an impact on Tring employment
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS105
<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>The Employment Strategy comment</b>	The employment strategy does not mention Berkhamsted, and the Tring area mentioned is barely significant. The employment opportunities are in London for these towns and this section should note the increase in rail passengers predicted and show where this capacity is on the rail network. I travel into London every day and note that there is little to no capacity for more passengers on the line into London.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS195
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS237
<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>The Employment Strategy comment</b>	<p>SP5 For Tring it seems a case of closing the door after the horse has bolted. Small scale employment space integrated into the town's fabric has been allowed to be changed into housing. Akeman Business Park is an example and another 26 others have been lost over the last 30 years.</p> <p>The growth Area TR 01 may provide a solution but I would hope that future units respect the prominence of location and be of a higher quality than the normal developer's tin sheds.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS251
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS306

<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS366
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS427

<b>Person ID</b>	1260387
<b>Full Name</b>	Colin Dealey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	re Tring Employment in any new business is important but suggesting new retail premises in a town that already has is fair share of empty town centre shops is a nonsense.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS446
<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>The Employment Strategy comment</b>	The aim to provide local employment to reduce commute times is laudable but I think that most of the people moving to the new developments in Tring and Berkhamsted will already have employment in London, Hemel Hempstead, Watford or around the M25 to St Albans and Hatfield so there will be an increase in traffic on the already congested A41 and London to Euston train service. This is without the huge building programme that Buckinghamshire is undertaking in and around Aylesbury. Although this plan talks about improvements on at the A41/M25 junction there are no timescales and a project as large at that will take years. The increased traffic will generate increased plastic pollution (see A41 at the

moment) which does not support your environmental aims. There will also be increased noise pollution especially as the A41 has one of the loudest road surfaces available (I guess it was cheap). There is no provision for increased train capacity.

Why we are encouraging employment in the South East rather than the deprived areas of the North West and East of the county is astonishing.

**Included files**

**Title** The Employment Strategy

**ID** EGS514

**Person ID** 1260809

**Full Name** James Mac

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment** There is nowhere near enoug employment in these areas to justify the number of houses being proposed. If people are being expected to travel outside the area for work then the houses should be built at those locations to reduce travel and impact on the enviroment. Has the plan taken into consideration the recent impact of C19 and the move to more home working?

**Included files**

**Title** The Employment Strategy

**ID** EGS595

**Person ID** 1261122

**Full Name** Mark Slade

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS624
<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>The Employment Strategy 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</p>

(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.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS708
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS727
<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> * Yes * No	Yes
<b>The Employment Strategy comment</b>	Will this strategy be reviewed following the coronavirus pandemic.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS741
<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>The Employment Strategy comment</b>	The employment strategy is absolutely terrible. Hemel Hempstead began as a "London overflow" and now has a huge problem with congestion as the town has expanded as a "London dormitory" and people have commuted predominantly into London for jobs. Towns such as Tring and Berkhamsted are traditional market towns to support farming communities and were never originally designed to support long distance commuting and large numbers of new inhabitants. The employment strategy needs to recognise that COVID has had a great impact on the working patterns for the future and Dacorum should rethink its approach to employment hubs, office space and retail outlets. Working from home and online ordering will be here to stay and most businesses (whether big or small) will be completely changing their approach to working practices so that they do not need to rent so much office space and will not expect their employees to be so physically present. I am sure that the Dacorum strategy was drawn up originally pre-COVID so this needs reworking to designate less office space and more fibre-connected homes and communities for great remote working and enjoyable local environments.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS871
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS1182
<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>The Employment Strategy comment</b>	Very few employment opportunities are provided in Berkhamsted despite a 25% increase in homes. In fact jobs will be lost on the Jewson site .The vast majority of new residents will be travelling to work by car to out of town locations
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1192
<b>Person ID</b>	1261840
<b>Full Name</b>	Rachel 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>The Employment Strategy comment</b>	This is an area I have minimal knowledge of but common sense tells me business and office practices are changing and certainly the concept of commuting to London or Birmingham will be altered considerably in the near and long term future. The Airports will also see a reduction in use so I think some caution should be addressed to the possibility of local employment opportunities being developed in this area linked to traditional employment streams. I would ask you to reconsider the possible options post pandemic especially as Dacorum has been a key commuter area and if commuting

ceases and people move elsewhere in the country and work from home there will be a reduction in the need for offices and housing for commuters. I note Berkhamsted and much of Tring have not got employment opportunities detailed which is great in some ways but surely will mean more travel on local roads if commuting from these towns to Hemel. The 500 bus will not get them to work on time!

**Included files**

**Title** The Employment Strategy

**ID** EGS1206

**Person ID** 1261875

**Full Name** Fiona Silver

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment** There is no employment strategy here for Berkhamsted, so new housing will lead to increased commuting and car usage

**Included files**

**Title** The Employment Strategy

**ID** EGS1213

**Person ID** 1142889

**Full Name** Dr Peter Chapman

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>The Employment Strategy comment</b>	The figures are confusing. But it would appear that Dacorum's shortfall (68000 sqm) could be transferred elsewhere. A legacy of Covid 19 is a change in working practices led by Zoom which may be permanent. Thus less demand in Office Space Para 8.19 is very important and should be pursued to avoid further use of Greenfield Sites
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1233
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1277
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	I support measures to reinforce employment opportunities in the Borough, but note the absence of any commitment to preserve or improve employment opportunities within or close to Berkhamsted, despite proposals for massive residential growth. Once again this will promote high-carbon travel and is a further argument against the sustainability credentials of the sites being promoted. It seems illogical for the site in Billet Lane being reclassified for residential development, as well as the loss of the BFI site. Surely the size of Berkhamsted should be able to support local employment to support the sustainability initiative as part of the Local Plan.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1306
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	Berkhamsted is not a Growth Area nevertheless it is counter productive to identify the Jewson site, Billet Lane for residential use given the employment and business opportunities it provides
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1326
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1359
<b>Person ID</b>	1262046
<b>Full Name</b>	Mr Richard Abraham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	The intention to provide twenty hectares of industrial and commercial development is unlikely to attract companies when there is already vacant office and commercial space in abundance; and that is before taking in the 'working from home' ethic brought about by Covid-19.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1461
<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>The Employment Strategy comment</b>	With the ridiculous housing numbers pressure in Dacorum, the plan is backward in moving forward. There is not enough local or regional employment opportunity for the housing numbers being proposed. These targets are too big to deliver for Dacorum. They are unreasonable.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1469
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1495
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1552
<b>Person ID</b>	1262260
<b>Full Name</b>	Gordon 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>The Employment Strategy comment</b>	The provision of office and warehouse space needs to be in-line with overall need, today there is undue emphasis on warehousing and not enough on high skill/high paid science & engineering opportunities. The loss of Fujifilm, Kodak, Honeywell, Lucas over the years has not been compensated for. Stevenage is the goto centre for such positions and this should be addressed.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1632
<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> * Yes * No	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1780
<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 * No	Yes
<b>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>• Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1806
<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>The Employment Strategy comment</b>	I do not see any evidence of an employment strategy to support this level of increased population.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1844
<b>Person ID</b>	1262473
<b>Full Name</b>	Mr William Tannett
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	Not convinced that jobs will follow housing, it should be the other way round, and the impact of the pandemic on ways of working is as yet unknown. It has also been reported that there is already a loss of many immigrant EU citizens reducing housing demand.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1910
<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>The Employment Strategy comment</b>	See my earlier comments in section 1
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS1977
<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>The Employment Strategy comment</b>	DBC's evidence used in their employment strategy is based on studies pre-Covid 19. Since then the unemployment level in Dacorum has risen. From October 2018 to September 2020, the unemployment rate rose by 0.3% to 2.4%.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2042
<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>The Employment Strategy comment</b>	8.3 Reality is moving faster than this sort of planning.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2051
<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> * Yes * No	Yes
<b>The Employment Strategy comment</b>	Where is the evidence for more employment growth at Dunsley Farm, Tring?
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2088
<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>The Employment Strategy comment</b>	The Employment Strategy. There is no employment strategy for Berkhamsted so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2115
<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>The Employment Strategy comment</b>	It is very unclear to me what you mean by employment development on Dunsley Farm. Any growth there will undoubtedly draw commuters from other parts of Dacorum. Apart from the nature of Tring being destroyed, this will require more infrastructure development,
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2200
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	This strategy is not going to help the local community with regard to employment instead it will ratchet up the number of people living here but commuting to London for work.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2251
<b>Person ID</b>	1262907
<b>Full Name</b>	David Beaumont
<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>The Employment Strategy comment</b>	<p>Where is the employment strategy for Berkhamsted? With 2,000+ new homes there needs to be some further local employers or we will see a massive increase in commuting to London and/or more cars travelling to Hemel, Tring or elsewhere.</p> <p>The roads are already crowded and rush hour trains full. Elsewhere the proposals talk of improving Berkhamsted station but the station is fine, it's the number of trains that needs improving. Plus, the massive increase in houses proposed for Tring surely indicates that the commuter load from there will also increase, adding further to the problems faced by Berkhamsted commuters.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2262

<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	Yes
<b>The Employment Strategy comment</b>	<b>The Employment Strategy</b> Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2285
<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>The Employment Strategy comment</b>	BRAG supports measures to reinforce employment opportunities in the Borough, but notes the absence of any commitment to preserve or improve employment opportunities within or close to Berkhamsted, despite proposals for massive residential growth.  Once again this will promote high-carbon travel and is a further argument against the sustainability credentials of the sites being promoted.

BRAG strongly objects to the Jewson site in Billet Lane being reclassified for residential development, as well as the loss of the BFI site.

**Included files**

**Title** The Employment Strategy

**ID** EGS2308

**Person ID** 1261830

**Full Name** alistair budd

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Employment Strategy comment**

**Included files**

**Title** The Employment Strategy

**ID** EGS2356

**Person ID** 1262244

**Full Name** Estelle Wraight

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>The Employment Strategy comment</b>	There is no suggestion of increased employment in Berkhamsted. Where is the high quality transport access then to work places? Plus no consideration of how the pandemic will change people's working patterns.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2360
<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>The Employment Strategy comment</b>	The evidence base does not take account of the dramatic changes to employment needs in light of covid 19 in particular but also brexit and economic changes. There is no reason in evidence for extending employment areas in to green belt countryside. There is evidence to support reallocation of existing office space to other purposes such as small manufacturing especially as office based work has declined with the experience of home working. Hotdesk rental space in shared use would free up significant office space for other uses. The assessment of industrial sites is woefully out of date for example Bourne End Mills has been transformed since 2016.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2372
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	"Releasing" land from the Green Belt to provide industrial development sites is appalling. The Council is supposed to be protecting our environment, not destroying it.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2409
<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> * <b>Yes</b> * <b>No</b>	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2501
<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>	Yes

* Yes	
* No	
<b>The Employment Strategy comment</b>	There is no policy for Berkhamsted!!!
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2524
<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> * Yes * No	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2543
<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

* No	
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2554
<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>The Employment Strategy comment</b>	Looks like there is no employment growth planned for Berkhamsted? I am confused, as to how any of the information in this section can be taken seriously with what we're now learning about how people will work/be employed in a post-COVID world.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2571
<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	Yes

* No	
<b>The Employment Strategy comment</b>	A big increase in population - where are they going to work? Berkahmsted is not a big town and there limited employment opportunities. The proposed size of the population can not support employment wise this increase.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2594
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2622
<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	Yes

* No	
<b>The Employment Strategy comment</b>	Improving employment prospects does mean building houses. In fact more houses, means more people which means more jobs required.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2718
<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 * No	Yes
<b>The Employment Strategy comment</b>	<p>I support the development of light industrial site in multiple locations to provide quality employment for resident which allows environmentally friendly commuting. The focus must be to provide these areas in multiple locations to facilitate reduced commuting.</p> <p>There is an opportunity to develop employment opportunities to attract high quality companies and individuals that the covid pandemic has encouraged away from London.</p> <p>I'm disappointed that an additional industrial area is not planned for Berkhamsted.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2764
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2787
<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>The Employment Strategy comment</b>	I broadly support the Employment Strategy although I believe a focus on providing infrastructure for working at home and facilitating development of domestic outbuildings as home offices should also be included in the Strategy.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2870
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2897
<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	Yes
<b>The Employment Strategy comment</b>	<p>With the pandemic, more people are likely to work from home in the future - at least part time. Whilst this wasn't anticipated when the plan was created, it does need reviewing now.</p> <p>Having so many new homes built and a decrease in people commuting will mean more pressure everyday on local town centres. More traffic on roads as people commute locally into their local centre for lunch or meetings.</p> <p>I would question the need for such extensive office space - 188000 sqm at least in the short term (over next 10 years).</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2916
<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>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted so the majority of the housing growth will have to be occupied by out of town commuters
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS2923
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3037
<b>Person ID</b>	1263491
<b>Full Name</b>	Peter 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>The Employment Strategy comment</b>	With the increasing working from home and internet shopping during the Covid lockdowns new shops are not needed.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3049
<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>The Employment Strategy comment</b>	<p>The Dacorum DLP does not include strategy for providing additional employment capacity in Berkhamsted and Northchurch. With the proposed 1,800+ houses growth in just this area, we must assume that must mean more out-commuting as a percentage of population?</p> <p>Not planning for more jobs in our area will result in it becoming a dormitory/commuting town to feed the wider area. Commuting levels will increase at a higher rate than the population growth, with added journey lengths and congestion with all the problems I stated above on car usage.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3158

<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>The Employment Strategy comment</b>	Put quite simply there is no employment strategy for Berkhamsted so each dwelling will be for out of town workers. A town that can ill afford further congestion and increase in air pollution. In fact the change of use of the Jewsons site and the BFI actually have the opposite effect in terms of employment, neither area should be developed/further developed.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3174
<b>Person ID</b>	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>The Employment Strategy comment</b>	The Covid-19 pandemic will change the way most office workers undertake their employment and the stresses on links to London and other larger employment centres will change. This has coincided with significant changes to retail and caused a major decline in our town and neighbourhood centres. The opportunity to renew these centres should be grasped as this will improve what are becoming run down spaces without opportunity to become the community hubs they should be. The employment strategy must be linked to all other strategy areas to reduce distance commuting as much as possible and to allow Dacorum BC as a whole to benefit from higher skilled work opportunities that have generally been moving out of the area.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3181
<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>The Employment Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3216
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3275
<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>	
Yes / No * Yes * No	
<b>The Employment Strategy comment</b>	There should be a designated Article 4 area covering Berkhamsted and Tring town centres, to require planning applications for changes of use from offices to housing. Further loss of town centres offices should not be approved unless a strong case is demonstrated, as there is a deficit of offices predicted in both areas and the Borough generally.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3287
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3300
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3313
<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>The Employment Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3319
<b>Person ID</b>	1263625
<b>Full Name</b>	Akira Eesa Developments Ltd
<b>Organisation Details</b>	Akira Eesa Developments Ltd
<b>Agent ID</b>	1263613
<b>Agent Name</b>	Simon Andrews

<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	There is a need for additional employment allocations within the emerging plan. The land proposed at Upper Bourne End Lane lies adjacent to an existing successful employment location and also adjacent to a proposed employment allocation in the emerging Local Plan. The site should be included within the next iteration of the Local Plan as an employment allocation and should be removed from the Green Belt. See accompanying report for details.
<b>Included files</b>	<a href="#">Upper Bourne End Lane representations Feb 2021 - FINAL.pdf (1)</a>
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3328
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS3394
<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>The Employment Strategy comment</b>	No Comment
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3405
<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>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers. More commuters, more traffic, more parking problems.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3433

<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>The Employment Strategy comment</b>	<p>No additional employment options are proposed for Berkhamsted, except maybe at the Lidl supermarket, which received planning in 2014. I understand the site has now been sold, so the supermarket is not guaranteed. In fact the loss of BFI, the Sarthe Business park and Civic Centre area, reduces employment opportunities within the town and will add to out-commuting, as will all the proposed developments.</p> <p>Should the availability of local employment opportunities, not be taken into consideration when large scale development is proposed, particularly in view of all the supposed commitments to sustainability within this plan.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3499
<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>The Employment Strategy comment</b>	Due to the pandemic, is the need for so many offices required, seeing that many people can work from home.
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3533
<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>The Employment Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3577
<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>The Employment Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3596
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3672
<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>The Employment Strategy comment</b>	This evidence is now out of date - the world has changed and employment needs have changed with it. You must stop the plan and reassess based on the new realities of the working world.
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
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<b>ID</b>	EGS3687
<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>The Employment Strategy comment</b>	<p>This plan does not provide for any new jobs in Berkhamsted. I deplore the loss of the Jewson Site which should be retained for employment.</p> <p>I also deplore the proposed extension to the existing employment areas in the Green Belt at Upper Bourne End Lane/Stoney Lane (Bourne End Mills). Do not build on the Green Belt, use brownfield sites instead.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3697
<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>The Employment Strategy comment</b>	the majority of people living in berkhamsted dont work here anyway
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3718
<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>The Employment Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3796
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	It is irresponsible to attempt to predict future employment patterns whilst we are in the middle of a pandemic..This consultation should be sheved until after the pandemic crisis.
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
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<b>ID</b>	EGS3854
<b>Person ID</b>	1263982
<b>Full Name</b>	Lisa York
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3931
<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>The Employment Strategy comment</b>	How is this relevant? There is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS3964

<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>The Employment Strategy comment</b>	Commercial development is important, but it should not risk adversely impacting existing businesses on those sites, whether they are owned or held on/operated under leases. The policy should reflect its support for existing business and restrict any development which causes any existing business to be forced to close or relocate, when they do not wish to do so.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4064
<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>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted. The immense uplift in housing in this area where people will not be able to work locally will lead to pressure on the roads which is unsustainable.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS4091
<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 * No	Yes
<b>The Employment Strategy comment</b>	The assumptions for office space probably need revisiting in 2022 once the dust has settled from the pandemic and it becomes more clear how much office space is actually required or whether the trend towards home working/ hot desking continues
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4122
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4152
<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>The Employment Strategy comment</b>	As the 'Economic Study Update advised against setting jobs growth targets in Local Plans.' it is difficult to see how there can be a meaningful Economic Strategy. More to the point, as there appears to be no plan for provision of employment within Berkhamsted, residents of Berkhamsted will need to commute, placing additional strain on already overloaded services and doing little to reduce the carbon foot print.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4182
<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>The Employment Strategy comment</b>	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.

There is insufficient local employment retained or proposed for Berkhamsted. Far too many people today already commute on the train to London or drive to locations outside of the town. This plan exacerbates this problem.

**Included files**

**Title** The Employment Strategy

**ID** EGS4187

**Person ID** 1258646

**Full Name** Jane Timmis

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment** **The Employment Strategy**  
 Please note 8.2 The NPPF - this is not the case in Markyate, where local businesses premises are being put forward to be developed.  
 Otherwise I am in favour of the plans for the Business/Industrial Park at Maylands Hemel Hempstead.

**Included files**

**Title** The Employment Strategy

**ID** EGS4197

**Person ID** 1264301

**Full Name** James Stringer

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4240
<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>The Employment Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “ windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4278
<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>The Employment Strategy comment</b>	The assumptions for office space probably need revisiting in 2022/23 once the dust has settled from the pandemic and it becomes more clear how much office space is actually required, or whether the trend towards home working/ hot desking continues.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4305
<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>The Employment Strategy comment</b>	8.9-8.15: The structure of this section is somewhat confusing. Is this a policy-on position, as it references an oversupply of office floorspace in SADC at East Hemel. A clearer narrative would be: <ul style="list-style-type: none"> <li>• set out what the current situation is with regards to employment floorspace versus demand (there is a critically low supply),</li> <li>• identify the need for net additional employment floorspace coming out of the 2019 Study for the SW Herts area, and the indicative number for Dacorum</li> <li>• explain the indicative distribution as set out in the evidence base / Study,</li> </ul>

- Confirm the status of this across SW Herts in DtC agreements where relevant, and
- Determine what the employment target is specifically for Dacorum Borough, and how this is distributed across the borough.
- If there is likely to be an oversupply of industrial land across the SW Herts region as a result of Maylands extension and SFRI, explain why the extension to Maylands and HertsIQ is meeting a need for more local market (rather than national strategic freight) and smaller units, and that it is aspirational and part of HGC setting the context for significant employment growth above identified need?

8.16 Provision of a *range of employment spaces and typologies within* local, district, town centres and other accessible locations should form part of the strategy.

8.20 This paragraph should be amended to make it clear that ‘given the provision at East Hemel Hempstead, we do not consider that **any land within DBC** should be released from the green belt for office development’ or similar, to avoid undermining the principle of East Hemel.

Also, need to ensure that 8.20 does not preclude mixed-use development where office space is provided in local centres on former green belt sites.

SP5 2 needs to acknowledge the role of new employment typologies in delivering the required floorspace and integrating employment space within local centres.

**Included files**

**Title** The Employment Strategy

**ID** EGS4321

**Person ID** 1263252

**Full Name** Alan Johnson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

* Yes	
* No	
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4448
<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>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4521
<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	Yes

\* No

**The Employment Strategy comment**

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.

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.

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** The Employment Strategy

**ID** EGS4573

**Person ID** 1145918

**Full Name** Mr Richard Tregoning

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**The Employment Strategy comment**

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4603
<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>The Employment Strategy comment</b>	There is no mention of any employment strategy for Berkhamsted, so almost all housing will be for out-of-town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4611
<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	No
<b>The Employment Strategy comment</b>	I agree that companies should be encouraged to set up or move businesses to the area, but for that to be attractive to their employees it needs to be an area that is attractive to live in and not clogged up with cars. Green Belt land is to be cherished and preserved for current and future generations, not destroyed.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4657
<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>The Employment Strategy comment</b>	<p>The employment strategy proposes using green belt land for employment development next to the A41 junction in Hemel Hempstead and at Dunsley Farm, Tring, and I wish to object strongly to the use of green belt land in this way.</p> <p>There is no mention of Berkhamsted within the employment strategy, meaning that residents in the town's proposed additional housing will need to travel to work. It is more than likely that will be mostly by car, adding to congestion and air pollution.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4696
<b>Person ID</b>	1264495
<b>Full Name</b>	Ian Fyfe
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	

<b>* No</b>	
<b>The Employment Strategy comment</b>	<p>The plan states that Dacorum has a shortfall of 68,000 sq. meters of office space and 120,000 sq. meters for industrial use. The primary site to reduce this is the extension of Maylands to the East, but it concedes that a substantial shortfall remains with a severe shortage of land for small and medium sized firms. The plan only talks about retaining existing industrial land in Berkhamsted and does not provide for any additional employment in the town.</p> <p>Employment comments</p> <p>Over the past 35 years while we have been resident in the town, industrial land has been lost to housing development in successive plans resulting in a severe imbalance between residence and employment . Berkhamsted has become a commuter town. Those who do work here cannot afford to live here. Those who live here need highly paid jobs not available in the area to support the cost of housing. A simple illustration is provided by Sunnyside church. They have a curate as part of their clergy. The church is required to provide suitable housing in the town. The cost of renting that accommodation would absorb almost all of the curate's stipend.</p> <p>This plan only exacerbates this problem by providing housing for people who will need to commute to their work adding to the severe congestion which already exists at peak travel times. (Congestion is recognised as a key challenge in the plan)</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4719
<b>Person ID</b>	1264485
<b>Full Name</b>	Charlotte Brown
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
<b>* Yes</b>	
<b>* No</b>	
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS4752
<b>Person ID</b>	1264510
<b>Full Name</b>	Martin Evening
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p>The Dacorum DLP does not include strategy for providing additional employment capacity in Berkhamsted and Northchurch. With the proposed 1,800+ houses growth in just this area, we must assume that must mean more out-commuting as a percentage of population?</p> <p>Not planning for more jobs in our area will result in it becoming a dormitory/commuting town to feed the wider area. Commuting levels will increase at a higher rate than the population growth, with added journey lengths and congestion with all the problems I stated above on car usage.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4792
<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>The Employment Strategy comment</b>	See previous comments re the need for economic and financial needs to be reassessed in the light of Covid. The plan is already out of date. Economic studies made in 2016 and 2019 are now not relevant. How much less so will they be in 2016.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4796
<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>The Employment Strategy comment</b>	There seems to be no employment strategy for Berkhamsted or Northchurch so any increase in housing will increase commuting and therefore congestion which at peak times is already severe.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4851
<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	Yes

<b>The Employment Strategy comment</b>	Consideration must be given to the way we are going to work in the future post pandemic. Office space will decrease. Home working will increase.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4855
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4920
<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>The Employment Strategy comment</b>	<p>In spite of vast growth, there are no plans for economic growth in Berkhamsted. Housing where proposed will result in high-carbon travel.</p> <p>The proposals for Herts IQ fit closely with the North Hemel Growth Area and underline that it will be more sustainable to build those houses in the current plan period rather than building a string of housing developments along the ridge at Berkhamsted.</p> <p>I object to the Jewson site in Billet Lane being reclassified for residential development, as well as the loss of the BFI site - the latter being a site that DBC previously supported for consolidation.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS4959
<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>The Employment Strategy comment</b>	The assumptions for office space probably need revisiting in 2022/23 once the dust has settled from the pandemic and it becomes more clear how much office space is actually required, or whether the trend towards home working/ hot desking continues.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5014
<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>The Employment Strategy comment</b>	Further employment land has already been designated adjoining Icknield Way in Tring, adjacent to existing employment. Since it is very well placed in relation to the road network, this should be carried forward into the new plan and not replaced with housing.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5031
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5047
<b>Person ID</b>	1264538
<b>Full Name</b>	Robert Theaker
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p>Clearly this document was written pre-Covid.</p> <p>Any decisions taken in this arena would need to be re-assessed in the light of changes, in particular, in the areas of retail and home working.</p> <p>Another aspect is the implicit fact that employment for many people in this area (and hence the need to be here) is because of the London job market. It is already clear that people are actively looking to re-locate to cheaper areas, further from London, post Covid, with people who would have commuted to London now working from home.</p> <p>Another key concern, (and this obviously challenges the original proposition starting with "a need for growth" in Hertfordshire) is that surely the consideration should be how to balance the economy, i.e. growth and employment outside the Home Counties.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5054
<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>The Employment Strategy comment</b>	<p>Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy.</p> <p>Without local employment the towns' proposed growth will foster a remote commuter-belt culture.</p>

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5083
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5089
<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>The Employment Strategy comment</b>	There is likely to be less demand for offices post-covid, so I think that the planned office space on the East Hemel site should instead be used for the industrial development you had planned to do on Green Belt land, enabling you to preserve these areas of the Green Belt.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5133
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p>It cannot be right that valuable Green Belt land is destroyed for the purposes of creating office space whilst so many other alternatives exists.</p> <p>SW Herts authorities identification of required space is acknowledged but not fully agreed. Whilst the identified office space requirement in Dacorum is 68,000 sqm this could be provided through multi-storey office blocks. The provision of Industrial space to accommodate 120,000 sqm could not be easily achieved although St Albans additional 80,000 capacity due to the East HH development directly adjacent to HH and west of the M1. With the Radlett Aerodrome development there is a now a surplus of land in SW Herts. So space in Dacorum is not needed although additional space could be provided on brownfield sites but many such sites do exist in regeneration areas. These would include Buncefield oil terminal.</p> <p>8.18 suggests massive loss of Green Belt to accommodate employment areas however, with sharing space from other SW Herts authorities, everything should be done to preserve the Green Belt in these areas.</p> <p>Currently no exceptional conditions exist to justify the Green Belt destruction proposed.</p> <p>Further floorspace growth should be limited to the Maylands Gateway /Breakspear Way to maximise the efficiencies of industrial are</p> <p>It cannot be right that valuable Green Belt land is destroyed for the purposes of creating office space whilst so many other alternatives exists. Maylands is an industrial centre that office space could be constructed in high blocks to support employment.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS5153
<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>The Employment Strategy comment</b>	The assumptions for office space probably need revisiting in 2022/23 once the dust has settled from the pandemic and it becomes more clear how much office space is actually required, or whether the trend towards home working/ hot desking continues.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5188
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5207

<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>The Employment Strategy comment</b>	The assumptions for office space probably need revisiting in 2022/23 once the dust has settled from the pandemic and it becomes more clear how much office space is actually required, or whether the trend towards home working/ hot desking continues.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5246
<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>The Employment Strategy comment</b>	While I support measures to reinforce employment opportunities in the Borough, there is no commitment to preserve or improve employment opportunities within or close to Berkhamsted, despite the proposal for massive residential growth. As I have a previously commented, this will promote high-carbon travel and is a further argument against the sustainability credentials of the sites being promoted. Additionally, I object to the Jewson site in Billet Lane being reclassified for residential development, as well as the loss of the BFI site.

In summary, there is no employment strategy for Berkhamsted, so the growth will only accommodate out of town workers, adding to the negative environmental impact.

**Included files**

**Title** The Employment Strategy

**ID** EGS5280

**Person ID** 1264532

**Full Name** Robert Clarke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Employment Strategy comment**

**Included files**

**Title** The Employment Strategy

**ID** EGS5324

**Person ID** 1264616

**Full Name** Philip Daw

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5352
<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 * No	Yes
<b>The Employment Strategy comment</b>	The pandemic has demonstrated that less office space will be required in future as more and more people opt to work from home. Many city companies have closed their offices altogether, this needs to be taken into account.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5387
<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 * No	Yes

<b>The Employment Strategy comment</b>	'Radlett Aerodrome strategic rail freight interchange in its Local Plan means that there is now a surplus of industrial land in South West Hertfordshire against the Economic Study Update's indicative floorspace figure.' New housing could be built on this brownfield site. I know it is not in Dacorum but why aren't St Albans building on this site; instead on green fields / green belt next to Hemel? Furthermore, to reduce carbon footprint shouldn't homes be built near employment. Radlet can only be conveniently accessed via car.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5398
<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>The Employment Strategy comment</b>	As stated in section 6, why are you looking to remove a current employer (BFI) and therefore decrease the number of jobs locally.  Again your suggestion for employment space in 8.10 is now a redundant point. The pandemic has changed the way people work. Office space is now likely to decrease in demand as employers realise they can let employees work from home, therefore meaning you should be looking for less of this. Further, as employers let people work from home and not commute, people have started to look further afield for houses. Therefore I suggest you reconsider your whole proposal as it is based on the past, not the future.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5427
<b>Person ID</b>	1264636
<b>Full Name</b>	Lynsey Bilisland
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted, so this will encourage commuters to move here. The vast majority of new houses will require people to drive to the station to commute
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5461
<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>The Employment Strategy comment</b>	This strategy has been superseded by the current pandemic and the resulting seismic shift in demand for commercial real estate. This requires further review to avoid unnecessary over provision.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5600
<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>The Employment Strategy comment</b>	There are very few employment opportunities created by these plans within Berkhamsted. The increase in houses will lead to an increase in commuters, filling the roads and the trains.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5614
<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>The Employment Strategy comment</b>	The greenfield development proposed in the local plan will not contribute to employment in Hertfordshire. The majority of people living in Berkhamsted commute to London for work. Berkhamsted is a commuter town, developing Berkhamsted will just encourage more commuters from London to live here. Developing greenbelt in Tring such as Dunsley Farm is completely unsustainable development when all indicators are pointing towards redeveloping brownfield and inner cities following Covid 19.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5623
<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	Yes
<b>The Employment Strategy comment</b>	The present pandemic has cast present and future employment needs in a new light. The reference points for the Plan are four and two years old. It therefore makes sense to review the employment strategy in the light of societal and employment changes consequent upon recovery from the pandemic and its long term economic impact.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5634
<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>The Employment Strategy comment</b>	There appears to be no employment strategy for Berkhamsted and Tring, so the growth will accommodate out of town workers. It would appear that many extra people would be commuting from Berkhamsted and Tring to Maylands Industrial Estate for work where the roads are already heavily congested.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5666

<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>The Employment Strategy comment</b>	This will not help employment, why aren't you focusing on fixing and cleaning our highstreets? You will provide better employment that way!
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5724
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5781

<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>The Employment Strategy comment</b>	<p>Not fit for purpose.</p> <p>By your own admission the 'Strategy' is based on studies from 2016 and 2019, but 2020's Covid outbreak turns all these assumptions on their head. Office rents are collapsing across the South East in response to home working, ( I know this to be true first hand as I have just secured a massive rent rebate on our office premises!) You will not by any stretch of the imagination need all the office space that Dacorum has now in the next 5 years, let alone the new space you are planning- 188,000 sqm extra offices is utterly insane!</p> <p>Home working is unquestionably greener and many find it positive in terms of mental health. You should be embracing it not planning to build endless new offices to crush it!</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5826
<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	Yes

<b>The Employment Strategy comment</b>	<p>The pandemic has changed the way that a large number of businesses operate. I think that this section should be reviewed in detail, consulting with local businesses as to their perceived need in the future when some form of home-working looks like becoming the norm.</p> <p>Dunsley Farm (Tr01) in Tring give a fantastic first impression of the town - a working rural landscape with fields, not houses and industrial units dominating. I think that the change of use of this site should be reconsidered in light of the fact that there is capacity to expand Castlemead in Pitsone which has undeveloped space for business units only a couple of miles from Tring.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5838
<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>The Employment Strategy comment</b>	<p>This plan does not provide for any new jobs in Berkhamsted.</p> <p>The loss of the Jewson Site would mean less jobs in the town.</p> <p>Like many people I strongly deplore the proposed extension to the existing employment areas in the Green Belt at Upper Bourne End Lane/Stoney Lane (Bourne End Mills). DBC should not be proposing to build on the Green Belt, use brownfield sites instead.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5877
<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>The Employment Strategy comment</b>	The assumptions for office space probably need revisiting in 2022/23 once the dust has settled from the pandemic and it becomes more clear how much office space is actually required, or whether the trend towards home working/ hot desking continues.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS5934
<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>The Employment Strategy comment</b>	There is no Berkhamsted employment strategy. The planners seem to wish to turn the town into a boarding house for out-of-town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6009
<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>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted. The town will increasingly become a dormitory town for London workers who will drive to the railway station to commute, increasing congestion and pollution.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6047
<b>Person ID</b>	1145998
<b>Full Name</b>	Mrs Pauline 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>The Employment Strategy comment</b>	Lots of empty offices and retail, difficult to believe more will be required.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6065
<b>Person ID</b>	1264772
<b>Full Name</b>	Adrian 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>The Employment Strategy comment</b>	The lack of wider alignment with Buckinghamshire gives me cause for concern when proposing proposal TR01 and the creation of a 7.4 hectare industrial site in Tring. There is not evidence that this can be supported by local business contained within the plan and seems to be opportunism and re-tasking of Green Belt to justify the proposed substantial growth in local housing. This appears to be an insular and Dacorum centric view.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6084
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6106
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6167
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6182
<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> * Yes * No	Yes
<b>The Employment Strategy comment</b>	The assumptions for office space probably need revisiting in 2022/23 once the dust has settled from the pandemic and it becomes more clear how much office space is actually required, or whether the trend towards home working/ hot desking continues.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6192
<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>The Employment Strategy comment</b>	There is no assessment of the number of jobs likely to be created by the allocated area in Tring (Dursley farm), but it cannot be many, and no allocated area for business development in Berkhamsted. The number of proposed new homes far exceeds the possible new jobs, so essentially housing is being created for commuters. Commuter housing does not need to be on Green Belt land.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6198
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6209
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6240
<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>The Employment Strategy comment</b>	<p>Small additions to countryside employment sites such as Bourne End seem to make no sense since they are accessed by lanes off the main road and make nonsense of the previous planning decision to reduce the site by building houses on it.</p> <p>There is no protection for the countryside built into this plan to avoid employment sites proliferating in barns that then grow and grow the built footprint with unsustainable traffic movement in characteristic banked country lanes.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6337
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6351

<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	Yes
<b>The Employment Strategy comment</b>	A plan to increase the size of Tring to this extent is not balanced and the plan for local employment is woefully inadequate.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6367
<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	Yes
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6383
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6390
<b>Person ID</b>	1264953
<b>Full Name</b>	C Ashwell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	Quite simply, the strategy to build on Green Belt land should be abolished. The Green Built was put in place to avoid the situation you are putting us in. By building on Green Belt, you will detrimentally change the whole area. We need breathing space around our towns. It is simply not good enough to designate another area slightly further out as Green Belt instead of the current Green Belt, because, very obviously, if you can do it once, you will do it again, and again, and again, until there is no land left to build on. Aylesbury to the North West and West of Tring has seen an incredible amount of growth, and increasing Tring by such an amount will reduce the quality of life of everyone in Tring. Nobody has considered the infrastructure. Car journeys to Oxford for instance already take 30 minutes longer than they did just ten years ago, and with the increase in housing, the increase in commuting (there are very few jobs in Tring) will ruin life for current residents.

Green Belt should be sacrosanct. You should not even be considering building on Green Belt. It was put in place for a very specific time, and that time is NOW.

**Included files**

**Title** The Employment Strategy

**ID** EGS6397

**Person ID** 1264916

**Full Name** Kathryn Spall

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment** There is no employment strategy for Berkhamsted so the housing growth will be for people who are working elsewhere with the consequent knock-on effects on transport, environmental impact and sustainability.

**Included files**

**Title** The Employment Strategy

**ID** EGS6436

**Person ID** 1264936

**Full Name** Jane Cracknell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6490
<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>The Employment Strategy comment</b>	There is some very useful employment in Tring and reasonable expansion would be good. It is indisputable however that most working age people in Tring work well outside of the town. They use the train or the road system for transport. Mainly in private cars. The extra people in the town would cause excessive traffic problems. The parking at Tring Station is already totally inadequate and there is no alternative parking within reasonable walking distance. Would builders/developers contributions pay enough to put this right?
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6537
<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	
<b>The Employment Strategy comment</b>	Can we see provision for the increased demands on broadband and electricity services? These too may need infrastructure.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6565
<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>The Employment Strategy comment</b>	I can see no evidence of an effective employment strategy. As there is no employment strategy for Berkhamsted, the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6655
<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	Yes

* No	
<b>The Employment Strategy comment</b>	I do not believe that the employment strategy can support all of the additional housing growth. This will result in either (i) increased unemployment (ii) increased traffic congestion (iii) further strain on mainline train services in/out of London.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6682
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out-of-town workers.. Therefore, is it really necessary for the number of developments in this market town?  Surely developments should be focused in Hemel Hempstead, where the city centre and New Town can be revamped, as well as the business park. This will provide a hub of employment. With the post-pandemic affecting a lot of retailers, there will be a lot of empty retail buildings. Surely some of these can be turned into accommodation too?
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6715
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy 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 employment strategy seems strangely empty of real opportunity and with these uncertain times in the middle of a pandemic no vision of the moment is present. This is just an outdated proposal.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6759
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6819
<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>The Employment Strategy comment</b>	There are no plans for high paid jobs in Berkhamsted. Highly paid jobs will be needed to acquire a house in Berkhamsted given the high land values (and consequently, high house prices). Therefore the housing that is proposed for Berkhamsted will be for London commuters, who will not be able to walk or cycle to the station given the challenging topography and the edge of town locations for the site, particularly the BK01 south berkhamsted site
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6821
<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	
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6842
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6867
<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>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted, so how can this plan justify the building of 2,200 dwellings? Most will use their car damaging the environment which the Council has promised to protect. This is yet another example of the Vision and Plan being inconsistent, unsustainable and flawed.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6881
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6946
<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>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6955
<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>The Employment Strategy comment</b>	8.7 casts doubt on the ability to improve connections including public transport To maylands Business Park. Why and what action should be taken. Accessibility is the most important factor these days for the Location of Industry.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS6990
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7042
<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> * Yes * No	Yes
<b>The Employment Strategy comment</b>	Too late to elaborate.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7069
<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>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted, so the growth will only accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7094
<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>The Employment Strategy comment</b>	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7127
<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>The Employment Strategy comment</b>	There is no employment strategy for Berkhamsted. Presumably the proposed growth will accommodate out of town workers - out of town workers who won't need to choose a busy commuter town if they don't need to commute (and are unlikely to choose it on any other basis since the character of the town will be destroyed by the development). The proposal fails to take into account post-pandemic working practices and, even in the incredibly unlikely event of working practices returning to normal, the locations of the sites will mean severe congestion through the town and on existing transport links which are already congested.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7159
<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>The Employment Strategy comment</b>	<p>The town of Berkhamsted does not have a job market big enough to accommodate its current working population, let alone adding to it by at least 25% (assuming there will only one worker per new home, which is unlikely). IF things return to our pre-COVID ways of working, are the local roads and rail facilities adequate to manage this? The station will be too far to walk to for most people, so they will drive, increasing traffic and congestion around the already busy school drop-off period in the morning. Where will they all park? Will the train station car park be expanded? How?</p> <p>If we don't go back to pre-COVID ways of working, do we need the housing at all? If people can work anywhere, why choose a small commuter town like Berkhamsted?</p> <p>The fact is, we simply don't know – we should wait and see what the demands of the future hold before blindly following an old plan based on old (and already faulty) assumptions.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7187
<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>The Employment Strategy comment</b>	Please, please think about what the post-pandemic landscape is likely to be! Any such plan cannot be based on fairly outdated data and algorithms. This is likely to be the most seismic shift we've seen since the industrial revolution, with home working, home shopping, etc. becoming the norm. Let's look and see what's really going to be needed!

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7225
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7266
<b>Person ID</b>	1265027
<b>Full Name</b>	Saba Poursaedi
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	More commercial office space is a good idea if your provide decent provisions for those commuting in.
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7289
<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	Yes
<b>The Employment Strategy comment</b>	<p>The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housing supply within settlements unaccounted for within the Housing Needs Assessment supporting the Plan, however, the Council have not sufficiently evidenced the likely provision of housing that will be supplied by such a policy.</p> <p>It is not clear as to whether the “windfall” calculation brought forward to support Policy SP4 has accounted for the potential implications associated with DM5. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7684
<b>Person ID</b>	1265757
<b>Full Name</b>	JENNIFER GAIL FREER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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 overcrowding of tiny thoroughfares puts school children and the elderly if the area at greater risk of accident and ill health caused by increase in air pollution.</li> <li>• This is not sustainable and does not take account of the responsibility to address climate change.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7797
<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
* Yes	
* No	
<b>The Employment Strategy comment</b>	8) Employment strategy – there is no employment strategy for any of the towns and villages mentioned in the Consultation documents, so the growth will accommodate out of town workers bringing further issues with traffic volume, amongst other issues.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS7867
<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>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7886
<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>The Employment Strategy comment</b>	— 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.
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7899
<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>The Employment Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS7933
<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>The Employment Strategy comment</b>	— 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.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS8068
<b>Person ID</b>	1266048
<b>Full Name</b>	RACHEL 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>The Employment Strategy 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’ 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>	The Employment Strategy
<b>ID</b>	EGS8082
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS8219
<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>The Employment Strategy comment</b>	(8): Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS8239
<b>Person ID</b>	1266155
<b>Full Name</b>	Annabel Carroll
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Employment Strategy 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' 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>	The Employment Strategy
<b>ID</b>	EGS8323
<b>Person ID</b>	1207813
<b>Full Name</b>	Graham Hale
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

**The Employment Strategy 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 MI/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

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS8412
<b>Person ID</b>	1266234

<b>Full Name</b>	LUCY DUGDALE
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p>&gt; 3/ Do you have any specific comments about the guiding policies?</p> <p>&gt; — 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>&gt; — 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>&gt; — 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>&gt; — 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>	The Employment Strategy
<b>ID</b>	EGS8545
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	There is practically nothing in the Plan about employment or where it will be situated, or the resources allocated to it. In Berkhamsted the proposal to convert the Jewson site to housing, will in fact reduce employment in the town. The Plan shows multiple inconsistencies of this kind the net result of which is to undermine its stated objectives.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS8572
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS8676
<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>The Employment Strategy comment</b>	<p><b>Paragraph 8.7</b></p> <p><u>Transport</u>. With regard to the economic messages for Dacorum that are outlined in this paragraph, high quality transport access includes all sustainable modes, with consideration given to the nature and timings of trips for employment to the Employment areas can function 24 hours a day, seven days a week, and a sustainable transport solution for these trips is needed. This makes high quality walking and cycling access critical for employment destinations, including provision for cycle storage/parking and changing etc.</p> <p><b>Waste uses</b></p> <p><u>Minerals &amp; Waste Planning</u>. The county council supports references to the adopted Waste Site Allocations DPD with regard to the acceptability of waste management uses within the employment areas listed in table 18 that are identified as employment land areas of search in the Waste Site Allocations</p> <p>The borough council should be aware that the Waste Local Plan (WLP) is currently being reviewed and a revised plan is anticipated for adoption by early It is likely that the revised WLP will not include specific employment land areas of search, but will instead include a criteria-based policy, regarding the acceptability of waste management uses in employment areas that predominantly contain B2 and B8 uses. As such, should the emerging WLP be adopted with the above approach (subject to consultation), the waste uses section within the draft local plan, including table 18 will need to be amended, prior to the publication of the regulation 19 version.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9071
<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>The Employment Strategy comment</b>	Employment Strategy: I have seen no suggestions of increased employment opportunities in this area. Bearing in mind that we will be in recovery from the Covid pandemic for some time to come, we may well have many unemployed people looking for local jobs. If there are no local jobs people will have to travel to find work. This will have a greater impact on the road system.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9095
<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>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9151
<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	Yes

<b>* No</b>	
<b>The Employment Strategy comment</b>	There is practically nothing in the Plan about employment or where it will be situated, or the resources allocated to it. In Berkhamsted the proposal to convert the Jewson site to housing, will in fact reduce employment in the town. The Plan shows multiple inconsistencies of this kind the net result of which is to undermine its stated objectives.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9154
<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> <b>* Yes</b> <b>* No</b>	Yes
<b>The Employment Strategy comment</b>	The Borough has ambitious plans for employment growth but has insufficient suitable land for such development and while Berkhamsted is not an Employment Growth Area it is counter-intuitive to allocate the Jewson employment site in Billet Lane for residential development. A similar point is made about the British Film Institute site. DBC must allocate sites for hot-desking and similar co-working areas and sites for manufacture. Otherwise this Borough becomes a commuter town only, which is not a sustainable policy.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9233
<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 * No	Yes
<b>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9272
<b>Person ID</b>	1267330
<b>Full Name</b>	Kat Worth
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy 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’ 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>

— 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** The Employment Strategy

**ID** EGS9286

**Person ID** 1267333

**Full Name** JO MURPHY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment** Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.

**Included files**

**Title** The Employment Strategy

**ID** EGS9301

**Person ID** 1267332

**Full Name** Nandi Jordan

**Organisation Details** Chair  
Berkhamsted and Tring Labour Party

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Employment Strategy comment</b>	Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9361
<b>Person ID</b>	1267367
<b>Full Name</b>	Sarah Johnson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Employment Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9375
<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>The Employment Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9389
<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>The Employment Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9411
<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	Yes

* No	
<b>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9436
<b>Person ID</b>	1267398
<b>Full Name</b>	Alexandra and James Donaldson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Employment Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9451
<b>Person ID</b>	1267401
<b>Full Name</b>	JACKIE BELLAMY
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9478
<b>Person ID</b>	1267417
<b>Full Name</b>	Wendy and Paul Goodridge
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Employment Strategy 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' appointments will require cars. This is not sustainable and does not take account of the responsibility to address climate change.</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.

— 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** The Employment Strategy

**ID** EGS9527

**Person ID** 1267427

**Full Name** Megan Humphreys

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Employment Strategy comment** There is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers, not benefit people who work in the town.

**Included files**

**Title** The Employment Strategy

**ID** EGS9619

**Person ID** 1151590

**Full Name** Lynda Clarke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

* Yes	
* No	
<b>The Employment Strategy comment</b>	(8) <u>Employment strategy</u> – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers. Development of existing employment sites eg Jewsons and British Film Archives further reduces employment opportunities.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9633
<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>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9670
<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> * <b>Yes</b> * <b>No</b>	
<b>The Employment Strategy comment</b>	<p>CPRE Hertfordshire also urges the council to reconsider the Employment Strategy in <b>Chapter 8</b>, in its entirety, to significantly reduce the amount of land and floorspace proposed for employment use, and in particular offices in the light of the different post-Covid context and the latest population and household projections that supersede the data in the Council's evidence studies (for example the South West Herts Economic Studies 2016 and 2019), and do not justify the claim (paragraph 8.7) that there are critically low levels of employment space. Paragraphs 8.10 and 8.11 need to be similarly amended.</p> <p>Statements about proposals in St Albans should be reconsidered, and less weight given to the aspirations of the economic partnership uninformed by any engagement with environmental interests or policy. Clearly the Council should not claim (paragraph 8.20) that there are exceptional circumstances for removing land from the Green Belt for employment use based on current evidence, and the proposed allocations in the Green Belt (paragraph 8.23) should be reconsidered, and policy SP5 and Table 3 amended accordingly.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9717
<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> * <b>Yes</b> * <b>No</b>	
<b>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9791

<b>Person ID</b>	1267544
<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> * Yes * No	Yes
<b>The Employment Strategy 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' 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>	The Employment Strategy
<b>ID</b>	EGS9852
<b>Person ID</b>	1267744
<b>Full Name</b>	GARETH BELLAMY
<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>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS9919
<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> * <b>Yes</b> * <b>No</b>	
<b>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS10010
<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>The Employment Strategy comment</b>	Employment Strategy There are too few local jobs already and massive development in the town will mean the new dwellings would attract out of town workers - leading to an increase in commuting, congestion and an unsustainable growth of carbon footprint.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10015
<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>The Employment Strategy comment</b>	— 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.
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10049
<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>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10157
<b>Person ID</b>	1268071
<b>Full Name</b>	LINDA SLIM
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	— 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.

— 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.

— 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.

**Included files**

**Title** The Employment Strategy

**ID** EGS10200

**Person ID** 1059789

**Full Name** Mrs Alison Somek

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Employment Strategy comment** Why are you extending office space, when the current pandemic is showing that working from home is likely to remain – at some level?

**Included files**

**Title** The Employment Strategy

**ID** EGS10224

**Person ID** 1268167

**Full Name** CHRIS YOUDELL

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10359
<b>Person ID</b>	1268427
<b>Full Name</b>	GRAHAM HAYNES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	Employment Development The plan for Tring appears to ignore the proximity of Tring to the general employment areas to the west of Aylesbury. The planned expansion of Aylesbury will create employment opportunities for Tring residents without the need for additional employment floorspace in Tring.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10399
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10451
<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>The Employment Strategy comment</b>	Towns such as Tring need to be places where people live and work. We don't want these towns to become dormitory commuter towns. Tring has already lost a lot of its small industrial and office spaces to residential conversion (Akeman Business Park, Silk Mill). The Local Plan must incorporate new business hubs and locate them where the local high street can be easily reached to benefit existing local businesses.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10661
<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>The Employment Strategy comment</b>	It is the North of England that needs an expansion policy for housing and employment not the South
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10672
<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>The Employment Strategy comment</b>	There is practically nothing in the Plan about employment or where it will be situated, or the resources allocated to it. In Berkhamsted the proposal to convert the Jewson site to housing, will in fact reduce employment in the town. The Plan shows multiple inconsistencies of this kind the net result of which is to undermine its stated objectives.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10692
<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	
<b>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>There is no employment strategy for Berkhamsted, therefore the majority of the housing growth will be occupied by commuters</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10720
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10734
<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>The Employment Strategy comment</b>	Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10811
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers. (10)
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10832
<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>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>There is no employment strategy for Berkhamsted, therefore the majority of the housing growth will be occupied by commuters</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10834
<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>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>Although the population would increase by approximately 25% there appear to be no plans to expand existing employment areas</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS10955
<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	
<b>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11370
<b>Person ID</b>	1269016
<b>Full Name</b>	Oliver Galliford
<b>Organisation Details</b>	Senior Planning Officer Hertsmere Borough Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Employment Strategy comment</b>	The South West Herts Economic Study suggests that Dacorum should make suitable provisions for 45,100 sqm of office space and 196,500 sqm of industrial space. Policy SP5 states that Dacorum will be looking for 116,550 sqm of industrial space and no net loss of office space. It will be important to clarify through the SW Herts Statement of Common Ground (SCG), and potentially other bilateral SCGs, how needs are being met across the FEMA as a whole. It is important to try to ensure overall needs are balanced with the need to provide employment space which supports local businesses and is close to all areas of the population. It is assumed that much of Dacorum's unmet needs will be met by St Albans, as part of the Hemel Garden Communities scheme. Consideration should also be given to the need for new employment provision to be sufficiently flexible to reflect changes in work behaviours as a result of Covid-19.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11379
<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>The Employment Strategy comment</b>	Policy SP5 – The Employment Strategy: 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, with DBC is looking to SADC for assistance on unmet industrial floorspace needs and to WBC for assistance on unmet office floorspace needs. 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 new employment commitments that may come forward.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11438
<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	Yes

* No	
<b>The Employment Strategy comment</b>	Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11677
<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>The Employment Strategy comment</b>	Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11723
<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>The Employment Strategy comment</b>	Re 8: Employment Strategy – There should only be modest growth, to avoid attracting more people to this area, instead of providing potential for employment in other parts of the country.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11767
<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> * <b>Yes</b> * <b>No</b>	
<b>The Employment Strategy comment</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>	The Employment Strategy
<b>ID</b>	EGS11870
<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>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11899
<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	
<b>The Employment Strategy comment</b>	<p><b>Question 2</b></p> <p><b>Comment re Sustainable Development Strategy</b></p> <p><b>Yes</b></p> <p>The driver for area growth is employment led – think Gold Rush.</p> <p>The pandemic patterns will change following the pandemic. People find they can work remotely, they do not need as much office space.</p> <p>Retail habits have changed, therefore retail space for shops is significantly reduced.</p> <p>Sustainable development will be based on flexibility not concreting over 850 hectares of green field sites.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11952

<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>The Employment Strategy comment</b>	<p><b>Employment Strategy</b></p> <ul style="list-style-type: none"> <li>• Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.</li> <li>• The Plan needs to be recast in the light of the major shifts in working and living habits accelerated by the Covid crisis. Working from home will significantly reduce the need for office space. In the Employment Strategy 8.10 additional office space of 188,000 square meters will need to be revised down, avoiding the need to encroach on Green Belt (8.18)</li> <li>• The town of Berkhamsted is already overwhelmed by traffic and under-provided with parking. Several businesses have already left the town for these reasons.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS11981
<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

* Yes	
* No	
<b>The Employment Strategy comment</b>	Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS12030
<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	
<b>The Employment Strategy comment</b>	<p>Herts LEP supports this strategy generally and the range of actions to deliver it through the Local Plan.</p> <p>The ESG has been prepared at a time of heightened uncertainty, and we are pleased this is acknowledged, as are the difficulties this places on the drafting of appropriate policies. Although a number of issues may be resolved before the publication of the draft Local Plan this is not certain to be the case, and it may be important to allow for an appropriate number of iterations going forward.</p> <p>We are pleased that the full range of cross boundary issues are identified and that Dacorum BC will produce an MoU and Statement of Common Ground in relation to address such matters; in the light of some of the issues identified in the ESG, this seems absolutely critical. The LEP requests that the option of it being a co-signatory of the MoU be considered.</p> <p>Whilst we accept that matters relating to meeting unmet employment needs (and one authority potentially meeting the needs of another) have been acknowledged in the ESG we are not entirely certain that the approach being taken to address such matters in individual Local Plans is the correct one. The ESG takes the view that amongst the 5 South West Herts authorities Dacorum is uniquely constrained in terms of its ability to deliver required growth because of need to protect natural assets associated with that part of the Chilterns located within its boundary; whilst this point can be</p>

readily accepted we do not know whether any of the other 4 authorities consider themselves 'uniquely constrained', perhaps for entirely different reasons.

A way of exploring the potential issues that this raises – and as the ESG acknowledges, there clearly are some - would be for all authorities to come together to resolve any problems, and it is pleasing to note that there is agreement to do this through the preparation of Joint Strategic Plan. However, we note that the timings implied in the ESG sees the JSPs preparation either in tandem with DBC's plan, or even, possibly, after it.

Whilst the JSP is clearly looking at planning over a much longer timeframe than DBC's Local Plan (2050 as opposed 2038) it appears to us that it may be more logical to agree key principles first and follow this with detail. The ESG acknowledges that it needs to enter into a MoU/SCG over cross boundary issues, and we are uncertain how realistic is this if there is not fundamental agreement on a number of overarching principles already in place.

Whilst it is not in the remit of Herts LEP to seek to advise local planning authorities on how to conduct themselves in relation to plan preparation, it is concerned that if the proper means to resolve cross boundary issues are not put in place, the delivery of sufficient employment land could become a casualty, as could other matters such as the revitalisation of the economy and protecting and enhancing town centres. The LEP would welcome further clarification on how such an issue can be avoided.

Notwithstanding the above the LEP welcomes the explanation within the ESG of the context in which emerging Plan policies will operate, and the identification of the key drivers of change

**Included files**

**Title** The Employment Strategy

**ID** EGS12086

**Person ID** 1269386

**Full Name** KERR LINDA

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Employment Strategy comment** Economy

Outside of the Covid crisis, a large percentage of Tring residents commute by train for work. The increase in car capacity at Tring Station still does not meet the need.

Tring does not offer significant potential for job opportunities. Incoming population will therefore add to the burden by increasing the need for commuting.

Rail services were already struggling to cope with passenger numbers, so the system will not cope with a further increase.

**Included files**

**Title** The Employment Strategy

**ID** EGS12119

**Person ID** 1269413

**Full Name** Mr Chris Wallis

**Organisation Details** Hon. Director of Development  
Tring Sports Forum

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Employment Strategy comment**

**1 The Employment Strategy**

In normal circumstances, TSF would not comment on this strategy, but should it be adopted as described, the impact on new housing, sport and leisure facilities, other green infrastructure such as cycleways and the environment generally would be immense.

Having had many meetings with HCC, it has become clear to us that they are so wound-up in their philosophy of maximising the value of their site, that other considerations are immaterial to them. What is even more worrying is that DBC seem to be bowing to their demands, without any thought for the wishes of the people of Tring or efforts to preserve Tring's character and the environment. The Dunsley Farm site is strategically one of the most important sites available in Tring, because:

- 1 It is adjacent to Tring Town Centre.
  - 2 It can house the majority of extra sports and leisure facilities required due to the increase in housing stock.
- It can provide part of a safe and environmentally friendly cycleway/electric scooter way/ leisure trail, linking the Town Centre to the railway station and the sports and leisure hub(s).

- 1 It can provide space for extra car-parking, thereby helping to relieve the serious parking problems in Cow Lane.
  - 2 Currently it is Green Belt land and can be treated sensitively, preserving ancient hedgerows and the like.
  - 3 Quality Sheltered and disabled housing and a care home could be built as near to the Tesco mini-roundabout and town centre as possible, thereby making access to the Town Centre and leisure facilities easy for the occupants.
- The majority of the site will be for housing, for sale and rent. The location is perfect for this purpose, having 1st class car-free access to all the facilities above as well as Tring Park etc. It is also adjacent to the A41 junction for ease of car access.

8.1 and 8.23 This strategy is floored from the outset for the following reasons:

- 1 The amount of (mainly industrial) development proposed for Tring is way out of kilter with the rest of the Borough. 7.4 hectares of 'employment development' on the Dunsley Farm site comprising 47,000sq.m is far more than 'sufficient.' Why does Tring need more of this than the rest of the sites in the Borough put-together?
- 2 Equally the vast area proposed is to a large extent in the wrong location, mainly for the 7 reasons stated above. Whilst there is a need for more small and medium business premises in Tring, an area of 2 to 3 hectares somewhere behind Tring Brewery for business and light industrial units would be more than sufficient for the Dunsley Farm site and probably for Tring as a whole for the period to 2038.
- 3 Should more than this be deemed to be required, there is probably another 2-3 hectares of developable land that could be considered at the West end of Tring on Icknield Way, with easy access to the A.41 roundabout.
- 4 No account has been made of the rapidly changing work patterns, brought forward even more quickly lately due to the current pandemic. Many adults of all working ages are getting used to working from home and it is expected that a good many will not wish to return to travelling regularly to offices etc. in Hemel Hempstead, London and elsewhere, but will choose to work from home instead. Many of the new houses could be built at little extra cost as 2 storey houses with extra office space being built into a mansard roof. Thus, a 100sq.m 3-bedroom house would have say an extra 40 sq. m of office space, (or a 4th bedroom,) without increasing the footprint.

8.2 to 8.15 About 1 mile from LA5, the new 260 house development to the West of Tring, is the rapidly expanding College Road Enterprise zone, centred on the new Arla dairy, the biggest in Europe. For DBC to work so closely with other Hertfordshire Boroughs and to ignore this area when considering employment requirements, is asking for trouble. The land of course is over the County Boundary in the new Aylesbury Garden Town, part of the new Buckinghamshire Council Unitary Authority domain. We keep getting told by the Councillors and Officers in DBC that the reason for persisting with this new Local Plan when it is almost certain that Government guidance is about to change, especially on housing requirements, is because the Government might call-in the Plan, leading to a development free-for-all. There is no doubt in our minds that this would happen anyway if employment opportunities for Tring residents just over the County border were not to be considered. As well as the oft-quoted St. Albans Council having their Plan called in, so was Aylesbury Vale District Council's, before the Unitary Authority was formed last year; the reason given for this was that they failed to negotiate cross-boundary agreements with neighbouring Councils. The message is clear – there are sufficient employment opportunities in and around Tring without ruining the Town's prime development site.

### **Policy SP5 – Delivering the Employment Strategy**

Item 2.h. and Table 3 should be amended to reflect a much smaller development in Tring.

**Included files**

**Title** The Employment Strategy

**ID** EGS12312

**Person ID** 1269489

**Full Name** STEVE HILL

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

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

**Included files**

**Title** The Employment Strategy

**ID** EGS12323

**Person ID** 1269489

**Full Name** STEVE HILL

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>The Employment Strategy 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>	The Employment Strategy
<b>ID</b>	EGS12383
<b>Person ID</b>	232349
<b>Full Name</b>	Mr Lawrence Parnell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p><b>Employment.</b></p> <p>Part 1, paras 2.7 and 15.6 confirm the need for increase and retention of Employment Areas. Para. 2.9 requires safeguarding of existing local employment areas and to that end confers General Employment Area status on Sunderlands Yard (para.15.5). However, by far the largest employment area serving Kings Langley is that in Home Park Mill Link Road, and along Station Road/Primrose Hill/Railway Terrace – in all, approximately 30 hectares (source; Three Rivers District Council (TRDC) Brownfield Register).</p> <p>Already, by virtue of its Brownfield designation, TRDC has permitted the conversion to residential of the former Astra Zenaca offices and Stannah House. Also, at the time of writing, permission is being sought for residential use on the site of the former West Herts College, and under construction for residential is the former industrial site adjoining Masters Yard. And given the Brownfield designation there is likely to be much more to come. Not only does this represent substantial diminution in local employment but the additional population places a demand on the community and social infrastructure of Kings Langley virtually all of which is within the area of Dacorum Borough Council (DBC). Yet there is no mention, let alone consideration, of this in the Local Plan; Emerging Strategy for Growth beyond a bland acknowledgement that most local employment is within the adjacent area of TRDC. It is vital for the credibility of the Local Plan, and in particular the furtherance of Part 1, paras., 2.7, 2.9, 8.7, 15.6 and DM17, that in respect to Kings Langley:</p> <p>1 DBC takes into account the changes already approved and taking place within the TRDC area, and</p>

2 Consults with TRDC, and argues against further diminution in existing employment floorspace.

**Included files**

**Title** The Employment Strategy

**ID** EGS12469

**Person ID** 629143

**Full Name** Mr Chris Briggs

**Organisation Details** Spatial Planning Manager  
St Albans City & District Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Employment Strategy comment** **4. Employment Need**

Overall, SADC note that DBC cannot meet its own employment need and are seeking support from SADC. As set out above, SADC's new Local Plan 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. As also raised previously in DtC discussions and elsewhere: there may be an opportunity for the potential employment growth, as previously identified in the now withdrawn former draft Local Plan at East Hemel (Central). If so, this could play a role in overall South West Herts employment land provision. However, this cannot be confirmed and will depend on whether or not work on our new draft Local Plan identifies similar need and opportunities for provision.

That work has not yet been undertaken or any decisions made, but the evidence, as currently exists, sets out that this is a realistic possibility. Further discussion on this should be had in the context of the overall joint work on the South West Herts geography/SWH Joint Strategic Plan.

Potential changes (subject to the SADC Local Plan process and ongoing Duty to Cooperate discussions) to paragraph 2.7 (set out in red text below and in following passages) are:

*Dacorum needs to plan for a significant increase in employment floorspace over the Plan period. **However, it is unable to meet its need in its administrative boundary. To meet the needs arising for new employment space Dacorum are working with St Albans City and District Council to see if they can accommodate a proportion of this employment need. This is being progressed through Duty to Cooperate discussions. Initial discussion include a possible***

~~the eastward expansion of Maylands, most of which would be into St Albans City and District Council. This **will** could meet a significant portion of Dacorum's needs as well as contributing to needs St Albans.~~

Potential changes (subject to the SADC Local Plan process and ongoing Duty to Cooperate discussions) to paragraph 8.6 are:

*"The multi-site Enterprise Zone includes part of Maylands Business Park in Hemel Hempstead and **includes the possibility of a proposed** 55 hectare East Hemel Hempstead employment site in St Albans City and District."*

Potential changes (subject to the SADC Local Plan process and ongoing Duty to Cooperate discussions) to paragraph 8.14 are:

*"~~If St Albans City and District Council's decision to~~ includes the permitted Radlett Aerodrome strategic rail freight interchange in its Local Plan, **it would** means that there ~~is now~~ **would be a potential arithmetic** surplus of industrial land in South West Hertfordshire against the Economic Study Update's indicative floorspace figure, **though some of the need that would be met would be a 'national' need.** However, the study stated that, although the rail freight interchange would enable all the strategic demand for industrial space to be met across South West Hertfordshire, there will still be a need for small and medium sized units in other locations to meet more local demand."*

Potential changes (subject to the SADC Local Plan process and ongoing Duty to Cooperate discussions) to paragraph 8.14 are:

*"Given this, we asked the other South West Hertfordshire authorities if they could take our unmet need. Dacorum and St Albans councils are working together ~~ensure that most of our unmet need will be accommodated on the East Hemel Hempstead site in St Albans City and District as a possible site to meet our unmet need.~~ **This process is subject to St Albans City and District Council Local Plan and ongoing Duty to Cooperate discussions. Dacorum consider that this site is ideally located, as it will act as an extension to Maylands Business Park. It also forms the principal development opportunity in the Herts IQ Enterprise Zone.**"*

The legislation makes clear that authorities can only set policy for their own administrative area. Therefore we consider that DBC would need to delete clause E in Policy SP5.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS12546
<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>The Employment Strategy comment</b>	<p>We note the absence of any commitment to preserve or improve local employment opportunities within or close to Berkhamsted.</p> <p>The Vision must include improved local provision and access to employment as a contribution to sustainability.</p> <p>We note in Topic 15 Employment Development [P84] the localities with designated GEA and the two new ones Two Waters and Dunsley Farm, Tring. The Northbridge Road site in Berkhamsted although supported by an Article 4 directive, should also be designated as GEA to protect local employment.</p> <p>We deplore the potential loss to housing development of the Berk11 Site [Jewson Site]. This site should be retained for employment.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS12685
<b>Person ID</b>	1269591
<b>Full Name</b>	Ross Campbell
<b>Organisation Details</b>	Client Director Aberdeen Standard Investments
<b>Agent ID</b>	1269593
<b>Agent Name</b>	Jessica

Wilson

**Agent Organisation**

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

**The Employment Strategy comment**

**Policy SP5 – Delivering the Employment Strategy**

With respect to part d), the points set out in relation to Policy SP2 above and the reference to ‘Offices: no net loss of space from 2025 onwards’, will not be repeated here, but are again relevant. It is noted that para. 8.15 acknowledges the current difficulty with accurately forecasting future employment floorspace needs which are likely to be affected by the Covid-19 pandemic. It is then considered that such a prescriptive policy is not appropriate and should be reviewed as set out above.

DBC make no mention of the General Employment Areas (‘GEAs’) in what appears to be a strategic employment There is reference to retaining existing employment sites at part f) but this is where sites ‘meet longer term needs’ and these cannot yet be accurately defined as is acknowledged in para. 8.15. The reference to ‘releasing sites that do not meet future requirements’ is supported although the wording should be amended to include ‘or where it has been demonstrated that the existing office use is no longer appropriate or viable’. This part of the policy should also be linked to the GEAs. It is noted that Policy DM16 below deals with the detail of the GEAs but if they are to be retained as part of the overarching ‘Employment Strategy’, then it is appropriate to reference in this policy too.

**Conclusions**

These representations are submitted to DBC on behalf of ASI in relation to the site.

The comments provided include the request for the review of specific policies and clarifications, and it is hoped that DBC will consider these to ensure that the Plan is found sound, and therefore in compliance with the NPPF (2019). This is most prudent when considering the requirement to maximise the development potential of previously developed land in sustainable locations, such as the site.

DBC must also ensure that policies relating to employment land do not restrict the delivery of development at suitable sites in order to meet their development targets and for development potential to be realised. In this respect, the proposed policy around GEAs should be amended as currently it is not considered to provide sufficient flexibility as is required by the NPPF (2019).

Overall, the direction of the new Dacorum Local Plan is supported and as the plan progresses, we would welcome the opportunity to further discuss the development potential of the site.

**Included files**

**Title** The Employment Strategy

**ID** EGS12706

<b>Person ID</b>	1269600
<b>Full Name</b>	Alex Marsh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>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 This contradicts the council's own net zero commitment as well as the UK's 2050 net zero commitment.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS12806
<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	
<b>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>There is no employment strategy for Berkhamsted, therefore the majority of the housing growth will be occupied by commuters</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS12870

<b>Person ID</b>	1207443
<b>Full Name</b>	Mrs Jennifer Bissmire
<b>Organisation Details</b>	Clerk Markyate Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Employment Strategy comment</b>	Ref 8.16.4 There are a number of commercial and industrial businesses in Markyate, but only one area is supported; there is no justification for this. It would reduce the sustainability of the village. Ref 9.1
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS12969
<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>The Employment Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS13045
<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>The Employment Strategy comment</b>	Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13163
<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 * No	Yes
<b>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>The Council has a 2030 net zero 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy

<b>ID</b>	EGS13177
<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>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>The Council has a 2030 net zero 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.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13196
<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>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>The Council has a 2030 net zero 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.</li> </ul>
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13211
<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>The Employment Strategy comment</b>	The Employment Strategy Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13325
<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>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>• Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.</li> </ul>

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13364
<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>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Tring and Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13391
<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>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13541
<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>The Employment Strategy comment</b>	Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13671
<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>The Employment Strategy comment</b>	Section 8 – Employment Strategy Object. pp.41-44, policy SP5.

As for the housing strategy, the employment strategy does not explicitly recognise the provision of NPPF para 11(b) that allows for plans not to meet identified needs for commercial development in full where policies of restraint apply. Paragraph 8.2 should recognise this.

This is of less concern to the CCB than the equivalent housing policy because the draft local plan tends to focus employment development either on existing underused sites or in areas of Hemel Hempstead away from the AONB. It is also important to the CCB that economic activity is supported in and around the AONB, especially if this is in sectors that are compatible with the AONB's designation.

We do have serious concerns with regard to how commercial premises will be positively managed through the planning system in future, with national policy often offering a favourable climate for the redevelopment or conversion of commercial sites and premises to residential use, exacerbated by current national-level proposals to increase the scope for this through permitted development rights. While the current proposals are not intended to apply within AONBs, they will apply in towns and villages on the edge of such areas, and this could have a significant impact on important local economic centres like Tring and Berkhamsted, with the inevitable knock-on effect of a need for more greenfield commercial development. The CCB would welcome working with DBC on measures to reduce this risk, including article 4 directions where necessary.

**Included files**

**Title** The Employment Strategy

**ID** EGS13784

**Person ID** 1144292

**Full Name** Mrs Rachel Hyland

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment**

- With the global pandemic of the last year the working lives of many people have changed with homeworking becoming the norm for many organisations leading to many families deciding to move further away from their commuter belt homes and further into the countryside. I know of at least 4 families that have left Berkhamsted for areas such as Suffolk and Dorset. The papers are reporting that organisations such as HSBC are reducing office space by 40% and my husband's office will now only have desks for 1 in 10 workers. This huge change needs to

be considered within these plans. Also, in the plans for the housing more time at home means an increased demand for local green area this plan removes our local green areas from residents of Swing Gate Lane.

**Included files**

**Title** The Employment Strategy

**ID** EGS13814

**Person ID** 1270385

**Full Name** Ms Katy Regan

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Employment Strategy comment** Many of the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UK's 2050 net zero commitment, and the Council's 2030 net zero commitment.

For example, policy SP2 b) and SP5 state that there should be no net loss of office floorspace from 2025 onwards. Considering the likely move away from office space by businesses looking to reduce costs after the pandemic, and maximise their use of new technology for home and distance working, this does not appear to be a logical starting point.

Policy SP5 seeks to grow employment through capitalising on the borough's position close to the M25 and M1, and this fundamentally contradicts the UK's 2050 net zero commitment.

**Included files**

**Title** The Employment Strategy

**ID** EGS13830

**Person ID** 777073

**Full Name** Mrs Anne Lyne

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Employment Strategy comment</b>	Policies SP5 and SP6: I am not convinced that sufficient consideration has been given to changing retail and employment patterns and needs post-Covid and post-Brexit.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13890
<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>The Employment Strategy comment</b>	The Employment Strategy Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS13993
<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>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14050
<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	No
<b>The Employment Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14148
<b>Person ID</b>	1163439
<b>Full Name</b>	Lindy Weinreb
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p>The Employment Strategy</p> <p>I note the absence of any commitment to preserve or improve local employment opportunities within or close to Berkhamsted. The Vision must include improved local provision and access to employment as a contribution to sustainability.</p> <p>I note in Topic 15 Employment Development [P84] the localities with designated GEA and the two new ones Two Waters and Dunsley Farm, Tring. The Northbridge Road site in Berkhamsted although supported by an Article 4 directive, should also be designated as GEA to protect local employment.</p> <p>I deplore the potential loss to housing development of the Berk11 Site [Jewson Site]. This site should be retained for employment.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14249
<b>Person ID</b>	1152075
<b>Full Name</b>	Rob Wakely
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p>Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.</p>
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14280
<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>The Employment Strategy comment</b>	(8) Employment strategy – there is no employment strategy for Tring and Berkhamsted, so the growth will accommodate out of town workers.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14349
<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>The Employment Strategy comment</b>	There is practically nothing in the Plan about employment or where it will be situated, or the resources allocated to it. In Berkhamsted the proposal to convert the Jewson site to housing, will in fact reduce employment in the town. The Plan shows multiple inconsistencies of this kind the net result of which is to undermine its stated objectives.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14352
<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> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p>These and supporting policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UKs 2050 net zero commitment, and the Council's 2030 net zero commitment.</p> <p>For example, policy SP2 b) and SP5 state that there should be no net loss of office floorspace from 2025 onwards. Considering the likely move away from office space by businesses looking to reduce costs after the pandemic, and maximise their use of new technology for home and distance working, this does not appear to be a logical starting point. Policy SP5 seeks to grow employment through capitalising on the borough's position close to the M25 and M1, and this fundamentally contradicts the UK's 2050 net zero commitment.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14418
<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>The Employment Strategy comment</b>	LCR and NR note the reference to draft allocation HH08 within draft Policy DM17 (Other office and industrial sites) and is generally supportive of this, although considers that this should be led by demand for this type of floorspace at the time a planning application is submitted, especially in light of the current situation with COVID-19 and remote working.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14436
<b>Person ID</b>	1270665
<b>Full Name</b>	Cllr Stephen Cloughton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	The policies need to be updated to reflect changes that are likely to result from the Covid-19 pandemic. It is unrealistic to plan for no net loss of office floorspace from 2025 onwards (policies SP2b and SP5), when businesses will want to reduce costs by maximising the use of home and distance working.  Growing employment through capitalising on the Borough's position close to the M25 and M1 contradicts the UK's 2050 net zero commitment in respect of carbon emissions.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14482
<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>The Employment Strategy comment</b>	Policy SP5 – Delivering the Employment Strategy fails to recognise the important role that non B and E class uses play in providing jobs. Uses such as care and nursing homes (C2) provide many skilled and unskilled jobs for local residents and play an important role in the local economy. An additional bullet should therefore be included to recognise the importance of non B and E class jobs and state that the Local Plan will encourage the development of employment generating uses on appropriate sites.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14871
<b>Person ID</b>	1270824
<b>Full Name</b>	
<b>Organisation Details</b>	Prologis
<b>Agent ID</b>	1270823
<b>Agent Name</b>	Nick Green
<b>Agent Organisation</b>	Director Savills
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	Prologis strongly support the employment growth strategy set out in the new Dacorum Local Plan, which seeks to deliver additional industrial and office floorspace in the Borough, with an emphasis on the growth of the existing Maylands Business Park as a sustainable and accessible location. Detailed commentary on the proposed employment growth strategy is set out below.

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area. The NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social, and environmental characteristics and prospects of the area.

In responding to the Council's current Regulation 18 consultation, we have made reference to the guidance set out in Paragraph 35 of the NPPF, which requires Local Plans to be sound. To meet this requirement they should be:

- **Positively Prepared** –be based on objectively assessed development requirements, consistent with achieving sustainable
- **Justified** –be the most appropriate strategy based on proportionate evidence.
- **Effective** –be deliverable over its period and based on effective joint
- **Consistent with National Policy** –enable the delivery of sustainable development in accordance with the policies of the

The following representations have been prepared with regard to these criteria and we set out below our comments on the soundness of the emerging Plan, taking into account its compliance with national planning policy.

The NPPF sets out a number of principles which planning policy should seek to enforce, including to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration. Paragraph 80 encourages conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Whilst not part of the development plan for Dacorum, the New London Plan places great weight on supporting the economy beyond the M25 and working with wider South East authorities to ensure appropriate space for economic growth, supported by good transport links. Land at Maylands Business Park does comprise a strategic location at the 'gateway' to Hemel, with excellent access to strategic highway network, including the M1 and M25.

The Council’s adopted Core Strategy places great emphasis on the growth and rejuvenation in Maylands Business Park as a core element of the strategy to maintain a balanced distribution of employment growth across the Borough.

This approach is retained in the Emerging Growth Strategy which states *“Regeneration and continued diversification of the Maylands Business Park will continue to form a key part of the strategy ,given added impetus by the creation of the Herts Innovation Quarter, a designated Enterprise Zone. Dacorum needs to plan for a significant increase in employment floorspace over the Plan period”*.

This is also reflected in the Economic Study Update (2019) which found:

*“High quality transport access is important for new employment development: high value office occupiers require high quality amenities and good public transport access, particularly to London. However, connections to Maylands Business Park are unlikely to improve sufficiently to produce substantial office growth there. Large and medium sized industrial firms require access to the strategic road network. Maylands Business Park dominates the market, particularly for strategic warehouses”*.

<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS14886
<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>The Employment Strategy comment</b>	Policy SP5 notes the lack of employment opportunities in the borough, which also lends support to the evidence (cited elsewhere) that the local housing need figure is While discussions are underway with St Albans to meet such unmet need, it is noted that the only realistic way to commute from Berkhamsted and Tring to St Albans is by car, on roads

which are already severely congested (e.g. the lengthy tailback at the A41/M25 junction in peak hours, and on the A4147 into St Albans).

**Included files**

**Title** The Employment Strategy

**ID** EGS14946

**Person ID** 1270499

**Full Name** Hertfordshire County Council Property

**Organisation Details** Property Team

**Agent ID** 1263792

**Agent Name** Ms  
Claire  
Newbury

**Agent Organisation** Senior Associate  
Vincent and Gorbing

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

**The Employment Strategy comment** **Employment**  
The South West Herts Economic Study Update (2019) identified land at Dunsley Farm as a potential future allocation in particular to meet an identified need for suitable small scale industrial uses to serve local HCC welcomes the allocation within **Policy SP5** of Dunsley Farm (Tr01) for the provision of employment land.

**Included files**

**Title** The Employment Strategy

**ID** EGS15097

**Person ID** 1270925

**Full Name** Mrs Kathryn Salway

**Organisation Details** Extinction Rebellion Dacorum

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	The Employment Strategy Improved local employment opportunities are required in Tring and Berkhamsted to support quality community development and vibrancy. Without local employment the towns' proposed growth will foster a remote commuter-belt culture.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15129
<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	
<b>The Employment Strategy comment</b>	Section 8 of the Emerging LP has regard to <i>The Employment Strategy</i> and <b>Policy SP5: Delivering the Employment Strategy</b> and acknowledges in Table 3 (Employment Growth Areas) that the Bovington Brickworks site (Growth Area Cy02) is one of two such areas in the countryside. BPC is supportive in principle of any proposals that will see the redevelopment of this site for employment generating purposes, as with the film and television activities at Bovington Airfield, that will help to support the economic prosperity of the village.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15284
<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>The Employment Strategy comment</b>	<ul style="list-style-type: none"> <li>• <b><u>Policy SP5 : Delivering the Employment Strategy</u></b> : It is noted that the employment strategy of the Plan relies heavily on the successful development of the 55 hectare employment allocation at East Hemel, which lies within St Albans District. In particular, the DBC Plan assumes that 84,000 m2 of the District's shortfall of office space and 80,000 m2 of the industrial / warehousing floorspace shortfall can be met within SADC (para 8.20). However, the South West Economic Study Update (which forms part of the evidence base for the Plan) notes that both Maylands and the 55ha of proposed employment land at East Hemel are not currently attractive market locations for new office development and viability remains uncertain throughout the Local Plan This is also noted at paragraphs 3.26 and 5.62 of your Employment Topic Paper. In view of this, it would not be sound for DBC to rely on land at East Hemel to make up for its shortfall in office space.</li> </ul> <p>Conversely, the industrial and warehousing market at East Hemel is very strong and TCE see no difficulty in the site accommodating the 80,000 m2 shortfall in these types of employment floorspace.</p> <p>For these reasons, Policy SP5(2)(e) should be amended to only refer to the role of East Hemel Hempstead in meeting DBC's unmet need for industrial and warehousing floorspace.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15456
<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>The Employment Strategy comment</b>	SEE ATTACHED RESP
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15473
<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>The Employment Strategy comment</b>	SEE ATTACHED RESP
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15587
<b>Person ID</b>	1271610
<b>Full Name</b>	MR SIMON MILLIKEN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Employment Strategy comment</b>	EH Smith SUPPORT the inclusion of Bovingdon Brickworks (General Employment Area) as an employment 'Growth Area' (Policy Cy02) for use classes E, B2 and B8 (Offices, Light Industrial, General Industrial and Storage & Distribution use) - subject to it being brought under the 'Bovingdon Delivery Strategy' as opposed to being listed as a site within 'The Countryside'.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15588
<b>Person ID</b>	1271610
<b>Full Name</b>	MR SIMON MILLIKEN
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>The Employment Strategy comment</b>	EH Smith SUPPORT the development of the employment 'Growth Areas' for both small and medium sized business uses (Criteria 2. C.) However, it is also essential that the policy needs to be sufficiently flexible to allow for larger sized units if needed to meet unmet demand (up to 2,000m2)- taking account of relevant market and commercial viability considerations.
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15589
<b>Person ID</b>	1271610
<b>Full Name</b>	MR SIMON MILLIKEN
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	EH Smith SUPPORT the confirmation set out in the written justification to Policy SP5 (Para 8.20) that the substantial shortfall in employment land within the Borough constitutes ' <i>exceptional circumstances</i> ' for justifying the release of some Green Belt land for industrial development. This paragraph should also make it clear that this applies equally to the 'extension' of existing 'General Employment Areas' within the Green Belt - such as the Bovingdon Brickworks Site (Para 8.23 / Policy SP11- Development in the Green Belt (Point 2)).
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15701
<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>The Employment Strategy comment</b>	Site Ref: E/1 Icknield Way <b>Recognised ecology sites within Site</b> No. <b>Recognised sites adjacent/ close to site</b> No. <b>Other features</b>

Previously developed land with Units and hardstanding. Boundary hedgerows.

**Protected species**

Bats (including roosting) are known to be in the area. There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.

**Opportunities**

Retain and enhance hedgerows. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.

**Biodiversity Net Gain (BNG)**

Consider measures to achieve net gain.

**Ecological sensitivity**

Low. Avoid light spill on adjacent habitats.

**Fundamental ecological constraint**

None. Preliminary Roost Assessment may be required.

**Included files**

**Title** The Employment Strategy

**ID** EGS15702

**Person ID** 1207333

**Full Name** Growth Team

**Organisation Details** Growth team  
Hertfordshire County Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment** Site Ref: DBLP Policy 31 / E5  
**Recognised ecology sites within Site**  
**NO**

**Recognised sites Adjacent/ close to site**

No.

**Other features**

Previously developed land. Mature hedgerow adjacent to the eastern boundary.

**Protected species****Opportunities**

Limited. Retain boundary trees. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.

**Biodiversity Net Gain (BNG)**

Consider measures to achieve net gain.

**Ecological sensitivity**

Low. Avoid light spill on adjacent trees / woody habitats.

**Fundamental ecological constraint**

None.

**Included files****Title**

The Employment Strategy

**ID**

EGS15703

**Person ID**

1207333

**Full Name**

Growth Team

**Organisation Details**

Growth team  
Hertfordshire County Council

**Agent ID****Agent Name****Agent Organisation****Yes / No**

Yes

\* Yes

\* No

**The Employment Strategy comment**

Site Ref: DBLP Policy 31 / E2  
Recognised ecology sites within Site

No.

**Recognised sites adjacent/ close to site**

No.

**Other features**

Undeveloped land. Grassland fields with mature hedgerows. Broadleaved woodland strip to the north, across the road.

**Protected species**

**Opportunities**

Retain trees and hedgerows and enhance. If whole site or a significant area is lost to development, consider measurable biodiversity offsetting to mitigate for loss of semi- natural habitats

**Biodiversity Net Gain (BNG)**

Offsetting will be expected and should be informed by an appropriate metric. We advise using the Natural England Biodiversity Metric 2.0 or subsequent versions thereof.

**Ecological sensitivity**

Low – medium if trees affected. Avoid light spill on adjacent trees / woody habitats.

**Fundamental ecological constraint**

None apparent. Ecological Appraisal and Preliminary Roost Assessment may be required.

**Included files**

**Title**

The Employment Strategy

**ID**

EGS15704

**Person ID**

1207333

**Full Name**

Growth Team

**Organisation Details**

Growth team  
Hertfordshire County Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

* No	<p><b>The Employment Strategy comment</b></p> <p><b>Site Ref: DBLP Policy 31 / E4</b></p> <p><b>Recognised ecology sites within Site</b></p> <p>No.</p> <p><b>Recognised sites adjacent/ close to site</b></p> <p>Yes, adjacent to 'Disused Railway Line, Hemel Hempstead' LWS on the northern boundary. Covered (?) reservoir at northern end</p> <p><b>Other features</b></p> <p>Undeveloped land. Agricultural land, cut. Areas of trees and hedgerows.</p> <p><b>Protected species</b></p> <p></p> <p><b>Opportunities</b></p> <p>Retain trees and hedgerows and enhance. If whole site or a significant area is lost to development, consider measurable biodiversity offsetting to mitigate for loss of habitats.</p> <p><b>Biodiversity Net Gain (BNG)</b></p> <p>Offsetting will be expected and should be informed by an appropriate metric. We advise using the Natural England Biodiversity Metric 2.0 or subsequent versions thereof.</p> <p><b>Ecological sensitivity</b></p> <p>Low. Avoid light spill on adjacent trees / woody habitats.</p> <p><b>Fundamental ecological constraint</b></p> <p>None apparent. Preliminary Roost Assessment may be required.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15723
<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	Yes
<b>The Employment Strategy comment</b>	<p><b>Site Ref: DBLP Policy 31 / E3</b></p> <p><b>Recognised ecology sites within Site</b> No.</p> <p><b>Recognised sites adjacent/ close to site</b> No</p> <p><b>Other features</b> Previously developed land with boundary trees.</p> <p><b>Protected species</b></p> <p><b>Opportunities</b> Limited. Retain trees and hedgerows to form green corridors to adjacent links. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p> <p><b>Biodiversity Net Gain (BNG)</b> Consider measures to achieve net gain.</p> <p><b>Ecological sensitivity</b> Low. Avoid light spill on adjacent trees / woody habitats..</p> <p><b>Fundamental ecological constraint</b> None. Preliminary Roost Assessment may be required</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15724
<b>Person ID</b>	1207333
<b>Full Name</b>	Growth Team
<b>Organisation Details</b>	Growth team

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Employment Strategy comment</b>	<p><b>Sharose Court</b></p> <p><b>Recognised ecology sites within Site</b> No.</p> <p><b>Recognised sites adjacent/ close to site</b> No</p> <p><b>Other features</b> Previously developed land. Units and hardstanding. Boundary trees on north-eastern side.</p> <p><b>Protected species</b> There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.</p> <p><b>Opportunities</b> Limited. Retain trees and enhance green corridor on north- eastern edge. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p> <p><b>Biodiversity Net Gain (BNG)</b> Consider measures to achieve net gain</p> <p><b>Ecological sensitivity</b> Low.</p> <p><b>Fundamental ecological constraint</b> None.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15726

<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	Yes
<b>The Employment Strategy comment</b>	<p><b>Land East of A41 Hemel Hempstead</b></p> <p><b>Recognised ecology sites within Site</b></p> <p>No.</p> <p><b>Recognised sites adjacent/ close to site</b></p> <p>Western edge is 10m from Roughdown Common SSSI (which is also Common Land). Also adjacent to part of Boxmoor Common Common Land.</p> <p><b>Other features</b></p> <p>Undeveloped land, two agricultural fields divided by a hedgerow. Boundary hedgerows.</p> <p><b>Protected species</b></p> <p>Bats (content removed) are known to be in the area. There may be potential for nesting birds in trees; and roosting bats in mature trees if suitable roosting features are present.</p> <p><b>Opportunities</b></p> <p>Retain trees and hedgerows. Create / enhance green corridors to adjacent habitats / SSSI. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates. If whole site or a significant area is lost to development, consider measurable biodiversity offsetting to mitigate for loss of semi- natural habitats.</p> <p><b>Biodiversity Net Gain (BNG)</b></p> <p>Offsetting will be expected and should be informed by an appropriate metric. We advise using the Natural England Biodiversity Metric 2.0 or subsequent versions thereof.</p> <p><b>Ecological sensitivity</b></p>

Low as considered unlikely to have any ecologically significant habitats. Avoid light spill on adjacent trees / woody habitats.

**Fundamental ecological constraint**

None apparent. Ecological Appraisal may be required to determine ecological interest and impacts of any development.

**Included files**

**Title** The Employment Strategy

**ID** EGS15727

**Person ID** 1207333

**Full Name** Growth Team

**Organisation Details** Growth team  
Hertfordshire County Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment**

**Bovingdon Brickworks**

**Recognised ecology sites within Site**

Yes, part of Ecosite known as Bovingdon Brickworks Borders.

**Recognised sites adjacent/ close to site**

Adjacent to Bovingdon Brickworks Central LWS.

**Other features**

Previously developed land with Units, hardstanding, area of brick pits, some trees and scrub

**Protected species**

(content removed) There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.

**Opportunities**

Retain trees and scrub. Create / enhance green corridor to adjacent habitats / LWS. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates. If whole site or a significant area is lost to development, consider measurable biodiversity offsetting to mitigate for loss of semi-natural habitats.

**Biodiversity Net Gain (BNG)**

Offsetting will be expected and should be informed by an appropriate metric. We advise using the Natural England Biodiversity Metric 2.0 or subsequent versions thereof.

**Ecological sensitivity**

Low. Avoid light spill on adjacent trees / woody habitats.

**Fundamental ecological constraint**

None apparent. Ecological Appraisal may be required to determine ecological interest and impacts of any development.

**Included files**

**Title** The Employment Strategy

**ID** EGS15728

**Person ID** 1207333

**Full Name** Growth Team

**Organisation Details** Growth team  
Hertfordshire County Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment** Bourne End Mills  
Recognised ecology sites within Site  
No  
Recognised sites adjacent/ close to site  
No  
Other features

Partial previously developed land, partially undeveloped land. Buildings/Units, hardstanding, scrubby grassland and scattered trees.

**Protected species**

There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.

**Opportunities**

Retain habitats where possible. Create / enhance green corridors to adjacent habitats. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates. If semi-natural habitats will be lost to development, and cannot be mitigated for within the site boundary, consider biodiversity offsetting.

**Biodiversity Net Gain (BNG)**

Offsetting will be expected and should be informed by an appropriate metric. We advise using the Natural England Biodiversity Metric 2.0 or subsequent versions thereof.

**Ecological sensitivity**

Low as considered unlikely the habitats will be of ecological significance. Avoid light spill on adjacent trees / woody habitats.

**Fundamental ecological constraint**

None apparent. Ecological Appraisal may be required to determine ecological interest and impacts of any development.

**Included files**

**Title**

The Employment Strategy

**ID**

EGS15729

**Person ID**

1207333

**Full Name**

Growth Team

**Organisation Details**

Growth team  
Hertfordshire County Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

<p><b>The Employment Strategy comment</b></p>	<p><b>Dunsley Farm</b></p> <p><b>Recognised ecology sites within Site</b></p> <p>Yes, ~Cow Lane Farm Meadows LWS.</p> <p><b>Recognised sites adjacent/ close to site</b></p> <p>Adjacent to ~Dunsley Bungalow Orchard &amp; Pasture LWS.</p> <p><b>Other features</b></p> <p>Working farm with cattle- grazed pastures, arable fields, and hedgerows. Western side has functioning farmhouse, farm shop, local brewery, and other businesses (?) and outbuildings.</p> <p><b>Protected species</b></p> <p>(content removed). There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.</p> <p><b>Opportunities</b></p> <p>Retain habitats where possible, especially LWS quality grassland. If whole site or a significant area is lost to development, consider measurable biodiversity offsetting to mitigate for loss of semi- natural habitats</p> <p><b>Biodiversity Net Gain (BNG)</b></p> <p>Offsetting will be expected and should be informed by an appropriate metric. We advise using the Natural England Biodiversity Metric 2.0 or subsequent versions thereof.</p> <p><b>Ecological sensitivity</b></p> <p>High if LWS grassland lost.</p> <p><b>Fundamental ecological constraint</b></p> <p><b>Yes LWS.</b> Ecological Appraisal and/or LWS quality survey may be required. Preliminary Roost Assessment of buildings and trees may be required.</p>
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<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15730
<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	Yes
<b>The Employment Strategy comment</b>	<p><b>River Park Berkhamsted</b></p> <p><b>Recognised ecology sites within Site</b> No.</p> <p><b>Recognised sites adjacent/ close to site</b> No.</p> <p><b>Other features</b> Previously developed land with Units and hardstanding. Some trees. Adjacent to canal.</p> <p><b>Protected species</b> Unlikely although there may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.</p> <p><b>Opportunities</b> Limited. Create green corridor on southern side by canal/river. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p> <p><b>Biodiversity Net Gain (BNG)</b> Consider measures to achieve net gain.</p> <p><b>Ecological sensitivity</b> Low. Avoid light spill on adjacent water habitats.</p> <p><b>Fundamental ecological constraint</b> None.</p>
<b>Included files</b>	
<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15731
<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	Yes
<b>The Employment Strategy comment</b>	<p><b>Two Waters Hemel Hempstead</b></p> <p><b>Recognised ecology sites within Site</b> No.</p> <p><b>Recognised sites adjacent/ close to site</b> Across the road from Boxmoor Common LWS / Common Land. <b>Other features:</b> Previously developed land with Units and hardstanding. Some trees and woody bank of railway line on southern edge.</p> <p><b>Other features</b> Previously developed land with Units and hardstanding. Some trees and woody bank of railway line on southern edge..</p> <p><b>Protected species</b> Bats (including roosting) are known to be in the area. There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present. There may be reptiles associated with the banks of the railway line if suitable habitat is present.</p> <p><b>Opportunities</b> Limited. Create green corridor on southern side by railway line. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p> <p><b>Biodiversity Net Gain (BNG)</b> Consider measures to achieve net gain.</p> <p><b>Ecological sensitivity</b> Low. Avoid light spill on adjacent trees / woody habitats.</p> <p><b>Fundamental ecological constraint</b> None. Preliminary Roost Assessment may be required</p>
<b>Included files</b>	

<b>Title</b>	The Employment Strategy
<b>ID</b>	EGS15732
<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	Yes
<b>The Employment Strategy comment</b>	<p><b>Two Waters Hemel Hempstead</b></p> <p><b>Recognised ecology sites within Site</b></p> <p>No.</p> <p><b>Recognised sites adjacent/ close to site</b></p> <p>Across the road from Boxmoor Common LWS / Common Land</p> <p><b>Other features</b></p> <p>Previously developed land with Units and hardstanding. Some trees and woody bank of railway line on southern edge. Historically, traditional orchards existed within the site</p> <p><b>Protected species</b></p> <p>Bats (including roosting) are known to be in the area. There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present. There may be reptiles associated with the banks of the railway line if suitable habitat is present.</p> <p><b>Opportunities</b></p> <p>Limited. Create green corridor on southern side by railway line. Consider enhancement measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates. Also fruit/nut tree planting.</p> <p><b>Biodiversity Net Gain (BNG)</b></p> <p>Consider measures to achieve net gain.</p>

**Ecological sensitivity**

Low. Avoid light spill on adjacent trees / woody habitats.

**Fundamental ecological constraint**

None. Preliminary Roost Assessment may be required.

**Included files****Title**

The Employment Strategy

**ID**

EGS15733

**Person ID**

1207333

**Full Name**

Growth Team

**Organisation Details**

Growth team  
Hertfordshire County Council

**Agent ID****Agent Name****Agent Organisation****Yes / No**

Yes

\* Yes

\* No

**The Employment Strategy comment****Apsley Hemel Hempstead****Recognised ecology sites within Site**

No.

**Recognised sites adjacent/ close to site**

No.

**Other features**

Previously developed land with Units and hardstanding. Woody bank of railway line on south-western edge

**Protected species**

There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present. There may be reptiles associated with the banks of the railway line if suitable habitat is present.

**Opportunities**

Limited. Create green corridor on south-western side by railway line. Consider enhancement measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrate

**Biodiversity Net Gain (BNG)**

Consider measures to achieve net gain.

**Ecological sensitivity**

Low. Avoid light spill on adjacent trees / woody habitats.

**Fundamental ecological constraint**

None. Preliminary Roost Assessment may be required.

**Included files**

**Title** The Employment Strategy

**ID** EGS15734

**Person ID** 1207333

**Full Name** Growth Team

**Organisation Details** Growth team  
Hertfordshire County Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Employment Strategy comment** Doolittle Meadow Hemel Hempstead  
Recognised ecology sites within Site

No.

**Recognised sites adjacent/ close to site**

Near to 'Grand Union Canal, Two Waters to Nash Mills Lane' LWS.

**Other features**

Previously developed land with Units and hardstanding. Trees throughout around car parking areas.

**Protected species**

Bats are known to be in the area. There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.

**Opportunities**

Retain trees. Create / enhance green corridor on north- eastern edge by canal. Consider enhancement measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.

**Biodiversity Net Gain (BNG)**

Consider measures to achieve net gain.

**Ecological sensitivity**

Low. Avoid light spill on adjacent water habitat.

**Fundamental ecological constraint**

None. Preliminary Roost Assessment may be required.

**Included files**

**Title**

The Employment Strategy

**ID**

EGS15735

**Person ID**

1207333

**Full Name**

Growth Team

**Organisation Details**

Growth team  
Hertfordshire County Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

Yes

\* Yes

\* No

**The Employment Strategy comment**

**Brook Street, Tring**  
**Recognised ecology sites within Site**  
No.  
**Recognised sites adjacent/ close to site**  
No.

**Other features**

Previously developed land with Units and hardstanding. Bank of trees on western edge.

**Protected species**

There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.

**Opportunities**

Limited. Retain trees and enhance green corridor on western side. Consider enhancement measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.

**Biodiversity Net Gain (BNG)**

Consider measures to achieve net gain.

**Ecological sensitivity**

Low. Avoid light spill on adjacent woody habitat.

**Fundamental ecological constraint**

None. Preliminary Roost Assessment may be required.

**Included files****Title**

The Employment Strategy

**ID**

EGS15736

**Person ID**

1207333

**Full Name**

Growth Team

**Organisation Details**

Growth team  
Hertfordshire County Council

**Agent ID****Agent Name****Agent Organisation****Yes / No**

Yes

\* Yes

\* No

**The Employment Strategy comment**

Northbridge, Hemel Hempstead  
Recognised ecology sites within Site

No.

**Recognised sites adjacent/ close to site**

No.

**Other features**

Previously developed land with Units and hardstanding. Trees throughout and on north-eastern and south-western edges. Historically, traditional orchards existed south and west of the site boundary.

**Protected species**

Bats (content removed) are known to be in the area. There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.

**Opportunities**

Limited. Retain trees and enhance green corridor on north-eastern side. Consider enhancement measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates. Also fruit/nut tree planting.

**Biodiversity Net Gain (BNG)**

Consider measures to achieve net gain.

**Ecological sensitivity**

Low. Avoid light spill on adjacent woody habitat.

**Fundamental ecological constraint**

None. Preliminary Roost Assessment may be required.

**Included files**

**Title**

The Employment Strategy

**ID**

EGS15756

**Person ID**

1271978

**Full Name**

JOANNA HARLEY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

<p>* <b>Yes</b></p> <p>* <b>No</b></p>	
<p><b>The Employment Strategy comment</b></p>	<p>This Council notes the absence of any commitment to preserve or improve local employment opportunities within or close to Berkhamsted. The Vision must include improved local provision and access to employment as a contribution to sustainability.</p> <p>We note in Topic 15 Employment Development [P84] the localities with designated GEA and the two new ones Two Waters and Dunsley Farm, Tring. The Northbridge Road site in Berkhamsted although supported by an Article 4 directive, should also be designated as GEA to protect local employment.</p> <p>We deplore the potential loss to housing development of the Berk11 Site Sarthe Business Park [Jewson Site]. This site should be retained for employment.</p>
<p><b>Included files</b></p>	

# 9 The Retail and Leisure Development Strategy responses

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS10
<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>The Retail and Leisure Development Strategy comment</b>	Cloud cookoo plans. The world has changed. more and more shops will close - not open. People won't open a shop just beacuse you've paved over a field to enable building to be built and wil remain empty. You are proposong to build "white elephants"
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS44
<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>The Retail and Leisure Development Strategy comment</b>	<p>As mentioned in section 9.2 <u>“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. It also recognises that a wide range of complementary uses and evening and night time activities can help support the vitality of town centres”</u>. Reflex’s section 9.9 regarding the 2018 study assessing the need for <u>“a range of leisure uses, namely, indoor sports and health and fitness; cinemas; restaurants; bars, pubs, social clubs and nightclubs; ten pin bowling; bingo; and theatres, galleries and museums and the loss of existing facilities should be resisted, if it would reduce choice in a sector with long-term demand”</u>. Since the Pavilion was demolished there has been no local venue for major musical and theatrical acts to take place in Hemel, while Berkhamstead has the old town hall and Tring has the rose Court.</p> <p>Is there any plans to develop the waste site next to the Jarmans park as mentioned in 9.16. There was a planned business conference centre to be built on it, is this still an option?</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS79
<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> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p>Tring High Street is struggling. We have seen all the major banks pull out over the last 3-4 years. COVID has now seen the closure of at least 3 restaurants and Thomas Cook &amp; the Betting shop. There are a small number of independant retailers, retailers,estate agents and the various pop up market stalls but nothing to act as a major draw. If we did draw more retail then the next issue will be car parking. Need to look at repurposing the unoccupied town centre space. Another supermarket at Dunsley Farm facing into Tescos is not what we need. Who would run it? Lidl's have a vacant undeveloped site already at Northchurch. Aldi have listed Tring as one of their many target sites. Tesco would probably want a larger replacement for their existing shop if they get the opportunity but new supermarkets generally are not being built anymore. Dunsley Farm is a good site but mixed use for industry, housing and leisure and maybe a convenience shop please, not another supermarket</p>

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS90
<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>The Retail and Leisure Development Strategy comment</b>	The Bulbourne Cross proposal includes 24 acres for a "sports hub" located in HP1, with eight or nine sports pitches. I believe this is unnecessary, given the existing sports facilities available within Berkhamsted - all major sports are currently well provided for, and any spare funding should be used to improve facilities at existing sites. The proposal also contemplates the development of the football ground at Broadwater, which would further add to housing density and traffic issues right in the town centre. I am opposed to this proposal, and hope that it will not form part of the Local Plan.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS125
<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>The Retail and Leisure Development Strategy comment</b>	The strategy for Berkhamsted is unrealistic. The town centre is dying due to poor planning and facilities.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS145
<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	Yes
<b>The Retail and Leisure Development Strategy comment</b>	The town centre plan for Tring includes adding an additional supermarket, offices and retail space when even before the pandemic shops, cafes and restaurants were closing leaving many premises empty. Since the pandemic this has increased. The message must be to use the existing premises not create additional ones. Any large structure such as an additional supermarket should be sited outside the town with additional parking.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS159
<b>Person ID</b>	1157347
<b>Full Name</b>	peter faulkner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	<p>Retail Strategy appears primarily to be based on 2018 research but the Covid pandemic has impacted on traditional retail and shopping habits in a way that, in 2018, was not foreseeable.</p> <p>The Marlowes is a sorry sight and a complete rethink is essential to the entire retail strategy. The town centre desperately needs a complete change; get rid of the awful, dated buildings erected in the 1950s and open up The Marlowes to the freshly landscaped riverside. Mixed retail, business and residential will restore life to the town centre.</p> <p>You rightly refer to neighbourhood shopping and that was a New Town feature from 1951. It should be revitalised to encourage local shopping and reduced reliance on cars and public transport.</p> <p>Such actions will improve local neighbourhoods and, most importantly, communities.</p> <p>These comments are not intended to criticise your efforts thus far but to urge you to reconsider what you are trying to achieve in the aftermath of Covid. You state that retail is fast moving but can never have envisaged the acceleration that we would witness. In addressing retail please be open to mixed developments involving residential and business; live local, work local and shop local has to be the environmental mantra for the future and your plan must reflect this.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS173
<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
* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	<p>You should use your influence to direct landlords in our town to stop putting independent retail businesses out of business. Independents care more about their environments than the larger retailers, increasing the character and heritage of our town. The handful of commercial landlords in Berkhamsted will continue to raise rents disproportionately - and this will only increase with the housing developments, resulting in a high street bereft of character and filled with the usual mega chains. Choice will vanish and homogenised retail will prevail. Destroying our town's culture and heritage further.</p>

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS196
<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>The Retail and Leisure Development Strategy comment</b>	The balance of population growth in Berkhamsted and Tring cannot be matched by the needed growth in retail provision. The Berkhamsted schemes actually plan to build on a substantial leisure facility - Haslams Field and the Sports Authority state that the leisure space is even currently well underprovided.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS228
<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>The Retail and Leisure Development Strategy comment</b>	<p><b>9.14 Tring retail development - High St/Brook St or Tr01</b></p> <p><b>Grocery retail</b></p> <p>The plan needs to include greatly increased grocery retail facilities (possibly at Tr01 Dunsley Farm Growth Area but facing east of Tring for the new housing at Tr03). As stated in the Issues document (Issue 3), the current Tesco over trades. We need another such store and its own parking of about the same size to be adequate for such a population increase and to catch-up with existing demand from Tring &amp; the expanding surrounding area. The High St/Brook St area is not appropriate as there needs to be additional parking provision, <b>the historic Local History Museum needs to be preserved as part of Tring's character and Brook St is already too polluted and congested.</b></p> <p><b>Town Centre Parking</b></p> <p>The plan needs to include greatly increased town centre parking. It is unrealistic to wish for many of the residents of the new housing to walk or cycle such increased distances from the centre of town. Increased parking provision is threatened by the proposed Tr06 High St/Brook St. retail development as the old cattle market in Brook St is needed for parking.</p> <p><b>Brook St congestion</b></p> <p>The plan needs to avoid worsening <b>Brook Street</b> pollution and congestion (as stated in Key Issue 20.6). The proposed Tr06 High St/Brook St. retail development and population increase can only worsen an already bad situation.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS252
<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>The Retail and Leisure Development Strategy comment</b>	I agree that out of centre retail schemes which are harmful to designated centres should be resisted. With this in mind the unused land at Jarmans should be designated for housing. It has been unused for a long time and if it had any potential for commercial use it would have been used by now.

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS281
<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>The Retail and Leisure Development Strategy comment</b>	<p><b>Comments on 9.2</b></p> <p>The changes that hyper connectivity (the rise of 200-300mbps mobile networks and 8-10-12 gigabit fixed networks) will drive will be transformative over the next 20 years. In short, they will free up a significant proportion of retail and car parking space, especially if augmented with effective green transport solutions. Many towns and cities have already seen peak retail, and the rise of hybrid virtual working is dramatically reducing the requirement for office space for firms, large and small. The Retail Development opportunity thinking feels conservative, therefore, and appears to underestimate the amount of office and retail space which companies transitioning to virtual 3D, augmented reality working will free up over the course of this plan.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS287
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Retail and Leisure Development Strategy comment</b>	I think Hemel like many UK towns is struggling to maintain a vibrant town centre. I'm pleased to read 9.7 and 9.8, and agree with the messages in this document. Perhaps some consideration of the provision of affordable, quality parking close to retail facilities might help maintain footfall in central, rather than out of town, locations.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS367
<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> * <b>Yes</b> * <b>No</b>	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS428
<b>Person ID</b>	1260387
<b>Full Name</b>	Colin Dealey
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Re Tring Already too many empty retail premises.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS458
<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>The Retail and Leisure Development Strategy comment</b>	The proposal to develop the Forge carpark in Tring is seriously flawed. Why would another supermarket be required in this position when that side of town is already well served by Tesco, M&S, Co-op, Morrisons, etc? The impact of the increased traffic this would bring to the centre would be horrendous. If another supermarket is needed, surely it should be in the West of town to serve the large development on LA5. We are supposed to be keeping our high streets well used and alive to stop the hearts of our towns from dying and reducing the amount of travel to out of town retail sites. There are already a number of empty units in the High Street, it would therefore be folly to off-set the town centre to a hub in the proposed way.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS517
<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>The Retail and Leisure Development Strategy comment</b>	There are large numbers of empty retail locations so why on earth would you want to build more at this time? The move is to online retail. The existing retail areas especially in Tring and Hemel are not currently working effectively so these should be investid in first before new locations are built.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS596
<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>The Retail and Leisure Development Strategy comment</b>	This should be left to market forces.
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS625
<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>The Retail and Leisure Development Strategy 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</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>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS706
<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

<p><b>The Retail and Leisure Development Strategy comment</b></p>	<p><i>9.9 The 2018 study assessed the need for a range of leisure uses, namely, indoor sports and health and fitness; cinemas; restaurants; bars, pubs, social clubs and nightclubs; ten pin bowling; bingo; and theatres, galleries and museums. It concluded that existing provision together with commitments is sufficient to meet most of the identified future needs. Therefore, no additional allocations are required for specific major new leisure facilities over the Plan period. Nevertheless, additional facilities should be permitted in sustainable locations. In addition, the loss of existing facilities should be resisted, if it would reduce choice in a sector with long-term demand.</i></p> <p>Hemel town centre is dying at the moment, with numerous shops such as Debenhams, Top Shop etc. closing down.</p> <p>A recent article in 'Hemel Today' reported that research by KPMG has shown "Hemel Hempstead is one of two Hertfordshire towns that have been ranked amongst the UK's most 'vulnerable' in the wake of the Covid-19 pandemic" .... "Continued remote working after the pandemic would lead to a reduction in footfall in those commuter towns." These towns may not have the night-time economy or leisure and culture facilities offered by core cities in other parts of the country, and this was accelerating the need to have town centre plans and some 'visioning' work.</p> <p>Surely a way to revitalise the town must be found, and this could be through developing the arts and leisure and industry in the town centre. The evening economy is practically non-existent in Hemel at the moment, and some sort of arts venue, perhaps combined with a museum, and/or an indoor market could inject much needed life and vitality into the town. <b>We need vision for our town centre, not more of the same.</b></p>
<p><b>Included files</b></p>	
<p><b>Title</b></p>	<p>The Retail and Leisure Development Strategy</p>
<p><b>ID</b></p>	<p>EGS709</p>
<p><b>Person ID</b></p>	<p>1261251</p>
<p><b>Full Name</b></p>	<p>Lesley Ashden</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>	
<p><b>Yes / No</b> * Yes * No</p>	<p>No</p>
<p><b>The Retail and Leisure Development Strategy comment</b></p>	
<p><b>Included files</b></p>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS728
<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> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Will the strategy be reviewed following the coronavirus pandemic?
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS758
<b>Person ID</b>	1261254
<b>Full Name</b>	George 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>The Retail and Leisure Development Strategy comment</b>	The proposed supermarket development for Tring potentially will kill off even more retail outlets in the town, which have suffered severely during Covid-19 and from large supermarkets' ability to continue trading in items they are unable to sell from their shops.

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS872
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1099
<b>Person ID</b>	1149209
<b>Full Name</b>	Mr Robert Scott
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Retail and Leisure Development Strategy comment</b>	Many unfortunate events have occurred and there are many more challenges to be overcome if Hemel Hempstead town is to succeed as a retail centre since proposals were first put together. With the demise of Debenhams and Arcadia these anchor stores will very likely lead to other retailers reconsidering the viability of retaining a presence in the town.

I note that the plan currently provides for expanding retail within the town, which should be the objective, but it will now need to be reviewed and the formation of a strategy that will lead to fresh interest from quality retailers. Without such initiative the town is at risk of becoming simply a convenience shopping stop for local people who would choose Watford, St Albans and even Berkhamsted for their important purchases. This in turn would demote the whole of Hemel Hempstead and result in its shopping centre becoming desolated.

Returning back to the town centre, the population balance for retailers is very important. A centre that only caters for basic, low end, goods and merchandise will not attract the breath of shoppers to survive. With John Lewis and Debenhams having closed in Watford, quality franchises and brands that depended on them will require alternative outlets as not all will be able to rely on on-line trade. Why would these businesses choose Hemel Hempstead as opposed to, as an example, St Albans as matters currently stand?

This is a key turning point for Hemel Hempstead. Dacorum Council have invested many millions of pounds so far in regenerating the town but if the right decisions are not made now it could result in a complete disaster.

I understand how complicated and difficult the issues that I have raised are to resolve. However the decisions to be made will determine if either Hemel Hempstead Town Centre goes back into decline after the excellent regeneration work carried out in recent years or they establish solutions to address the changes that have occurred, including attracting new quality retailers.

Please advise how the major changes and implications identified above will be addressed in the development of the plan.

May I just clarify that my point is that through the experience of recent major events and changes that I referred to, I believe there should be a significant review of the published Local Plan as far as retail provisions in Hemel Hempstead town and housing is concerned. I am uncertain whether you are confirming that this will be the case or that the original proposal will remain unchanged, envisaging perhaps some more minor changes through the consultation process and future governance. Without specific research and a review being carried out for guidance beforehand it is difficult to see how feedback through general consultation and subsequent consideration can be fully effective towards arriving at the right final plan.

I would appreciate your further advice and information covering the Council's proposals for dealing with this. I understand the pressures that you and your team must be working under with the volume of comments and apologise for adding to this, but I do believe it to be of fundamental importance.

My apologies for continuing to engage on these matters but as you can tell, I consider them extremely important and I really do care about the great area that I live in. I look forward to seeing how the matters will be addressed through the Local Plan implementation processes. I do not necessarily expect a further response from you at this stage but I just wanted to make sure that I have made my points totally clear for due consideration.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS1171

**Person ID** 868491

**Full Name** Mr Graham Hoad

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Retail and Leisure Development Strategy comment** SP6 High Street shops and restuarants are under pressure in Tring High Street from conversion to flats and offices.This should be resisted and help to retail given by relaxation of business rates and tightening up of use class orders.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS1193

**Person ID** 1261840

**Full Name** Rachel Heath

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	I am concerned that rushing plans for this area will not reflect the issues that the pandemic is leaving us with and more scruffy leisure and retail developemnst will spring up with insufficient customers rather like Hemel Town Centre. I have therefore wondered if a better mix of housing in with retail and leisure provision should be considered.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1207
<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
* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	The provision of only a small retail offer in the South Berkhamsted building area will mean that people in this area will rely on the town centre for most of the shopping needs thus leading to increased congestion.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1214
<b>Person ID</b>	1142889
<b>Full Name</b>	Dr Peter Chapman
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

Yes / No * Yes * No	Yes
The Retail and Leisure Development Strategy comment	Re Para 9.14. To suggest putting a supermarket at Dunsley seems absurd ! It will front directly onto Tesco. Car converging in two directions on London Road
Included files	
Title	The Retail and Leisure Development Strategy
ID	EGS1234
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
The Retail and Leisure Development Strategy comment	<p><b>Policy SP6 ‘Retail &amp; Leisure Dev’ Strategy’, section 9.14 (Page 46)</b></p> <ul style="list-style-type: none"> <li>Relative to other towns Tring has a high proportion of vacant High Street properties; it is doubtful that additional, traditional retail space is required in the centre. Within Tr02/03 it is a different matter. There is, however, a potential case, building both on Tring’s market heritage and history of local food growth, for modern dedicated market facilities, support for a modern ‘food hub’ (as implemented for example in Stroud or Rotherhithe) and/or other new community facilities such as a Repair Shed.</li> </ul> <p><b>Policy SP6 ‘Retail &amp; Leisure Dev’ Strategy’, section 9.14 (Page 46)</b></p> <ul style="list-style-type: none"> <li>Reference ‘<i>a new out of centre supermarket in Tring would be justified. We regard the Dunsley Farm Growth Area as the best alternative location.</i>’ We strongly disagree with this conclusion, which is based on discussions and assumptions over 5 years old. <b>A site near the Bulbourne corner of Tr03 should be actively considered to reduce travel time and traffic.</b>We agree that additional food supermarket space may be required given that many of the shoppers in Tring travel from north of Tring. However, another supermarket close to the existing Tesco delivers little to the community or to the objectives of the Plan. An alternative might be to re-site the existing Tesco and repurpose the space it currently occupies.</li> </ul>

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1327
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1360
<b>Person ID</b>	1262046
<b>Full Name</b>	Mr Richard Abraham
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes	Yes

* No	
<b>The Retail and Leisure Development Strategy comment</b>	Likewise ( <i>See comment under Policy SP5 - Delivering the employment strategy</i> ), 'additional retail space' when shops are boarded up and large companies such as Selfridge going into administration.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1396
<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>The Retail and Leisure Development Strategy comment</b>	Tring town centre is woefully inadequate to support the scale of development planned. The High street is narrow and busy, with no room for further development. The planned development would be a unnecessary and unsustainable strain on the infrastructure.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1463
<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

* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	Shops at the moment are shutting and Banks have closed. Before any large scale development takes place, the council should be looking at supporting what is already in place and encouraging the reduction of landlord rent for shops which are currently struggling.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1496
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1555
<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>	

Yes / No * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	The area set aside for business and retail in Tring will split the town centre and whilst it may reduce its draw for people and traffic a split site is likely to increase traffic and have a negative effect on the existing businesses. I support the decision not to build more out-of-town retail parks.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1604
<b>Person ID</b>	1261385
<b>Full Name</b>	stephen hearn
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	
<b>The Retail and Leisure Development Strategy 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>

### The History and Current use of the Site

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

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

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

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

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

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

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

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

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

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

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

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

#### Points of Consideration

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

#### Planning Matters for Consideration

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

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

#### **Included files**

#### **Title**

The Retail and Leisure Development Strategy

<b>ID</b>	EGS1633
<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> * Yes * No	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1807
<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>The Retail and Leisure Development Strategy comment</b>	The minimal retail proposal will not be sufficient for the housing development it is meant to serve. All people will travel to the main supermarket in Berkhamsted or drive to Hemel. This will all lead to an increase in traffic.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS1911
<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	
<b>The Retail and Leisure Development Strategy comment</b>	The plans for the further development of Hemel town centre do not reflect the current retail environment, exacerbated by the Covid-19 situation. Riverside has never been fully occupied and now Debenhams is empty. It would be better to use the areas that are planned for redevelopment as retail here as further housing instead, as prime town centre sites.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1935
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1959
<b>Person ID</b>	1262618
<b>Full Name</b>	Jasmine 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>The Retail and Leisure Development Strategy comment</b>	Is this plan up to date with the need for retail space? Shops have been closing, some have been taken over by internet providers and a lot more food shopping is now online Do we need more retail space??
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1976
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS1982
<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>The Retail and Leisure Development Strategy comment</b>	As this section indicates the pandemic will have consequences which will not be fully understood for some time with accurate forecasts not yet possible. As the study advises DBC to closely monitor and regularly update the position on capacity, need and strategy, it makes no sense at all for DBC to develop a build strategy for 18 years. Why plan housing on Green Belt when the need and society as a whole may be very different in 5 to 10 years time?
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2052
<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> * Yes * No	No
<b>The Retail and Leisure Development Strategy comment</b>	

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2084
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2121
<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>The Retail and Leisure Development Strategy comment</b>	There is no doubt that the High Street in every town has been declining over the last 10 years or so. Tring for instance has no Banks and COVID has further damaged local retail. However, you must consider the other infrastructure requirements (roads, parking, bus services etc.) as well as just retail outlets. Good luck with this endeavour!

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2264
<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	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p><b>The Retail and Leisure Development Strategy</b></p> <p>The affects of Covid are unknown in terms of employment, shopping and leisure. This consultation should be paused until more is known.</p> <p>Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.</p> <p>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>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2286
<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>The Retail and Leisure Development Strategy comment</b>	BRAG supports Policy SP6, but in respect of Berkhamsted it is unlikely that the small-scale retail provision in Growth Area Bk01 will be viable and therefore will not reinforce the credentials of the unwanted residential development in this location.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2320
<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>The Retail and Leisure Development Strategy comment</b>	If there is substantial growth planned as in Berkhamsted and Tring why is there not a commensurate uplift in sports and leisure facilities given that existing facilities are already full and in the case of the Berkhamsted sports centre ,rather old .
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2357
<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>The Retail and Leisure Development Strategy comment</b>	Having a football stadium out of town will only increase traffic and congestion, whereas people can walk to it in town at the moment. Improve the current leisure centres instead.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2373
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2395
<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>The Retail and Leisure Development Strategy comment</b>	There is a danger that infrastructure will be on the car based models of the past where scale has been linked to footfall. A different scenario for local shopping has no economic model or past history so mixed use retail and leisure development needs more information to be a robust guide to planning development.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2410
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2448
<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>The Retail and Leisure Development Strategy comment</b>	<p>There are already too many fast food shops in Dacorum, It is important to offer residents a mixture of retail outlets.</p> <p>In Bovingdon please encourage more small independent retail shops to open.</p> <p>Leisure: Bovingdon already has a bowling club, football club, tennis club, cricket club and 2 public golf courses nearby. Gyms/leisure facilities are down the road in Hemel.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2504
<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> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	SP6 3.1 - Berkhamsted high street must not be elongated and then fragmented too much. Also, if Northchurch is being developed significantly where will these residents park if they drive to Berkhamsted Town Centre? Does Northchurch need its own High Street? Why is this not addressed?

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2527
<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> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Retail competition is healthy, and we should encourage appropriate outlets. However their location should be suitable for both pedestrian, bus and car users. Brook Street in Tring, and the High Street, are narrow and unsuitable for large volumes of traffic. In addition, the Local History Museum, housed in the old market house, is an important feature in preserving the history and character of the town. It sits to the side of the market car park, and its demolition would be a tragedy.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2544
<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	No

<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2595
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2719
<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	No

* No	
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2765
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2788
<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

* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	SP6 1d In preparation for increased tourism (hopefully in part through acquisition of National Park status) I recommend consideration of the development of a craft centre or craft park where small retail units and workshops are co-located and ideally close to workers housing to create an artisanal community and tourist attraction, preferably in West Dacorum. Dunsley Farm on the outskirts of Tring would provide an excellent location for such a craft hub as it would build on the reputation of the Farm shop and provide specialist craft goods without competing with Tring or Berkhamsted town centres.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2871
<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>	No
* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2899
<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	Yes
<b>The Retail and Leisure Development Strategy comment</b>	In Berkhamsted, our town centre is vibrant and pleasant. I definitely support a new supermarket in Gossoms End and we do need more creative ways to have small retail areas (sympathetically done) in south Berkhamsted. A few eating establishments, convenience shops would prevent traffic going into the town centre during the day for small purchases and provide a focal point for small pockets of the community.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2915
<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>The Retail and Leisure Development Strategy comment</b>	The town would be improved by the provision of small retail outlets to accomodate small business and encourage diversity in the variety of shops, such as in Berkhamstead. We also need to encourage quality resturants, rather than all the large chains that can be found in all large towns.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS2932
<b>Person ID</b>	1263422
<b>Full Name</b>	Zoe Bone

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p>The housing numbers in the local plan across Dacorum are excessive and well above the forecast housing need for the boroughs as calculated by the ONSI.</p> <p>The impact on the local boroughs is disproportionate and does not consider recent and existing developments in the local areas. It severely impacts the existing infrastructure, air pollution, congestion, road safety and not to mention the mental health impacts on local Residents. The use of green belt land as well is just inexcusable. Whilst I appreciate the need for further housing, this proposal is beyond excessive.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3039
<b>Person ID</b>	1263491
<b>Full Name</b>	Peter 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>The Retail and Leisure Development Strategy comment</b>	With the increasing working from home and internet shopping during the Covid lockdowns new shops are not needed.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS3088
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3110
<b>Person ID</b>	1263457
<b>Full Name</b>	Matthew 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>The Retail and Leisure Development Strategy comment</b>	Tring is a gateway town to the Chilterns and there is no clear strategy about how this will be effectively managed to the benefit of the Town and the inhabitants. COVID situation has seen huge numbers of people visit the Town , which is great and should be encouraged, but there is simply not the capacity to manage this and maintain quality of life for residents. Hastoe lane becomes impassable at weekends, Car Parking also becomes impossible in the Tring Triangle Area. In the High Street there are an increasing number of empty shop units which is a concern to what was once a vibrant centre. Areas such as the Akeman St business park could have been redeveloped for mixed use of leisure &

retail but instead have all been converted to housing which contributes nothing to the atmosphere of the conservation area

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS3162

**Person ID** 1262255

**Full Name** AJ W

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Retail and Leisure Development Strategy comment** There is no mention of outdoor leisure facilities to support local sports. There is a dearth of land for this as it is without increasing the pressure on the facilities that Berkhamsted currently has.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS3177

**Person ID** 1263498

**Full Name** Peter Reynolds

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>The Retail and Leisure Development Strategy comment</b>	I agree that the Covid-19 pandemic will change the way our town and neighbourhood centres can operate and encouraging more people to work closer to our centres will increase the retail demand and possibly increase local opportunities to expand. As a smaller hub, Hemel Hempstead centre has suffered from online sales and the migration of office work to outside Dacorum. Aligning the opportunities correctly now can promote higher value work to the centres and provide greater prospects for retail to operate as there will be higher value customers.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3218
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3337
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.  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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3395
<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> * <b>Yes</b> * <b>No</b>	No
<b>The Retail and Leisure Development Strategy comment</b>	No Comment
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3418
<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>The Retail and Leisure Development Strategy comment</b>	In respect of Berkhamsted it is unlikely that the small-scale retail provision in Growth Area Bk01 will be viable and therefore will not reinforce the credentials of the unwanted residential development in this location.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3456
<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>The Retail and Leisure Development Strategy comment</b>	<p><i>In Berkhamsted the Council will:</i></p> <p><i>Reinforce the role of the town centre and support proposals which will maintain its vibrancy.</i></p> <p>This is just words – there is no detail on how you would propose to achieve this, and no proposal to enhance the town centre, which cannot expand, being surrounded by residential development.</p> <p><i>Support the delivery of the permitted supermarket at Gossoms End (Growth Area Bk13)</i></p> <p>More words – the Supermarket received Planning permission 6 years ago and nothing has happened. What do you propose to do to “<i>support the delivery</i>”– given it already has planning permission? - see Q8 - I understand this site has now been sold so provision of a supermarket there is now in doubt.</p> <p>Given the plan supports an additional supermarket - which alternative site is proposed ?</p>

No new arts/music centre is proposed in the Borough nor is considered in your analysis of leisure facilities. Such a venue in an area of this size is sadly lacking since the demise of the Pavillion. Surely this is an opportunity to build in plans for such an important facility. Hemel would seem the most appropriate central setting, and such a facility would surely make an important contribution to the regeneration of the town.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS3500

**Person ID** 1263810

**Full Name** David Tolfree

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Retail and Leisure Development Strategy comment**

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS3534

**Person ID** 1263821

**Full Name** Anne Isherwood

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3578
<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>	No
* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3598
<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> * <b>Yes</b> * <b>No</b>	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3673
<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> * <b>Yes</b> * <b>No</b>	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3696
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p>Please keep Berkhamsted Sports Centre open, do not build on the green field adjacent to the Sports Centre, Development of Haslem Fields will result in less recreational facilities for children who need them even more after living in lockdown. Health and Well-being of the local community should be paramount in any local plan.</p> <p>One of your points in this section is to increase, promote tourism. One reason that people like to live in Berkhamsted and Northchurch is because of the easy access to beautiful open spaces the on the edge of the Chilterns AONB. People will not come to visit if this is decreased and traffic, congestion and pollution increased.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3698
<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> * <b>Yes</b> * <b>No</b>	No
<b>The Retail and Leisure Development Strategy comment</b>	Berkhamsted already has 3 gyms, multiple parks and nice countryside to enjoy walking in before its destroyed for new housing
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3719
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3802
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	The concept of town centres as shopping hubs has changed. This strategy does not look to reuse town centres as dwellings, preferring to use green land instead.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3857
<b>Person ID</b>	1263982
<b>Full Name</b>	Lisa York

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3932
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS3965
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4070
<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>The Retail and Leisure Development Strategy comment</b>	I suggest this needs to be revisited post pandemic to consider the effects on changing behaviour and use of office/retail space. Much leisure time around Berkhamsted and Northchurch is spent walking and cycling around the countryside and gardening, rather than formal leisure activities. The removal of local green leisure space and the provision of ever smaller gardens in Berkhamsted houses will force people to drive to e.g. Ashridge, which is already showing the damage caused by over population and visitor numbers.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4092

<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 * No	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4123
<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>The Retail and Leisure Development Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS4158
<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>The Retail and Leisure Development Strategy comment</b>	It is difficult to see how a meaningful strategy can be proposed at a time when the entire retail and leisure world is changing. The NPPF view that the importance 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) has been overtaken by events and it is now widely accepted that many brownfield sites will become available in town centres providing housing opportunities.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4186
<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>The Retail and Leisure Development Strategy comment</b>	My comments are in relation to the development plans for Tring. The report describes Tring as a market town and states the plans objectives to maintain its unique market town community. More than any other town in Decorum, Tring has maintained a strong community spirit and support for localism seen by

the good retail mix. Although the the plan claims to help support the High Street retail sector the plans only firm proposal is to build yet another Supermarket. It is almost as if this plan was written in the 1980 not the 2020s. To make Tring sustainable retail development has to embrace localism not multinational edge of town stores.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS4188

**Person ID** 1264269

**Full Name** Paul de Hoest

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Retail and Leisure Development Strategy comment**

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

There is a lack of inclusion of green spaces such as parklands - some of the chosen sites should not be housing estates but could be small nature reserves on the edges of our existing conurbations. There is a lack of sporting facilities - already youngsters are short of facilities. Consider these aspects before adding more homes which simply adds greater pressure.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS4189

**Person ID** 1258646

<b>Full Name</b>	Jane Timmis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p><b>Retail and Leisure Strategy</b></p> <p>No strategy for Markyate?</p> <p>The villages are always excluded from retail and leisure strategies. We now have problems among some of the young, with drug users and anti social behaviour as there are few resources for them.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4198
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS4262
<b>Person ID</b>	1262647
<b>Full Name</b>	Carolyn 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>The Retail and Leisure Development Strategy comment</b>	I do not feel that the proposals take full account of the likely impact on retail from the current pandemic. There are proposals for further retail outlets, both in Hemel town centre and out at Jarman Park - both of which would appear to be unnecessary. Since the building of the Riverside shopping area there has never been a time when all the retail outlets in Hemel town centre have been fully occupied, or anywhere near. There are some units in Riverside that have never been occupied, and now we know that the Debenhams store will be empty. Similarly there are many empty units at Jarman Park and the shops which were included in the redevelopment of the old Kodak building again did not get occupied. Strings of empty shops are depressing and give a bad impression of a town, please do not add to this situation with unnecessary retail development. The spare land at Jarman Park would be much better used for housing.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4279
<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> * Yes * No	Yes

<b>The Retail and Leisure Development Strategy comment</b>	<p>It is obvious to many that retail has changed radically over recent years. Investment in town-centre and out-of-town retail, is a waste of resources. Changes in the physical retail environment have been exacerbated by the COVID-19 pandemic, with many national retail chains disappearing.</p> <p>Grovehill, Woodhall Farm and Gadebridge are not listed under 'Local Centres' despite the fact that LA1 and LA3 will increase local population considerably.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4283
<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>The Retail and Leisure Development Strategy comment</b>	<p>I agree providing with the ambitions in this section of the plan, in particular the additional schooling and healthcare provision, providing it is actually delivered by developers. Clearly my comments elsewhere on reduced housing requirement need to translate through into reduced need for these support services, although not completely as there is currently under-provision of schooling and healthcare within the borough.</p> <p>In addition, the less visible infrastructure such as water supply also needs to be delivered to avoid more water being removed from the chalk aquifer with further damaging to the remaining green belt and AONB, Chiltern Beeches SAC and general local biodiversity</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4308
<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>The Retail and Leisure Development Strategy comment</b>	<p>Local Centres need a much stronger strategy – explain the importance of Local Centres in HH from a retail network and town-wide and neighbourhood scale layout and design perspective. What does a successful one look like? Scale and capacity? A good example is Adeyfield Local Centre, which was built to serve 10,000 residents (see green historic HH book for reference). There is a fear that the new Local Centres will not provide the same mix of uses. Other successful LCs include Stoneycroft, and Leverstock Green. Chaulden is a good example of a small Local Centre. Success means thriving and no vacancies and the general layout and design encourages walking and cycling.</p> <p>Sustainable travel options/hubs are integral part of all new centres.</p> <p>9.11: Need to make the point that convenience floorspace is to be located walking distance from/with a 360 degree catchment of residential areas or similar, to promote active travel.</p> <p>Table 4: Where are the rest of HH Local Centres in this table – make clear that this is selected local centres not comprehensive?</p> <p>SP6 2d: It is not explained what is meant by ‘smaller scale local or neighbourhood centres’. What differentiates these from local centres, and is there a policy approach to them?</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4395
<b>Person ID</b>	1264312
<b>Full Name</b>	Angela Delglyn
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p>Area Tr06, in my opinion, should NOT be considered in the scope of this development; I feel that would very much detract from the unique character that draws potential shoppers/browsers to Tring's High Street area.</p> <p>I suspect it is common for developers and planners alike to speculate on potential profit-bearing ideas whilst forgetting that the character of a town like Tring is something to be nurtured. What took centuries to develop can be killed off with one wrecking ball, never to return. Let us not forget that historic connections provide the curiosity factor that makes each town unique. It's the flavour that people choose to align with that makes them want to revisit; and it's the desire to revisit that keeps the town alive. If development of any part of that area is to be considered, it should only be a part of that land - I.e. the firestation if its not receiving much use - and it should be in keeping with the character of the town. Definitely NOT a supermarket.</p> <p>The market area is currently holding it's own now that the stalls are back, and has great potential to continue to improve and increase in line with demand, both from locals and visitors. (In many parts of the country, markets are seeing a resurgence in attendance as people seek forgotten connections to the origins of their food and produce). If you take away the space for the market, you'll cut out the beating heart of the town and destroy the circulation that keeps the community alive.</p> <p>A separate neighbourhood in the new development to the east of Tring would be a more sensible idea, but remember, creating the heart that ignites the interest will take time and consistent energy.</p> <p>To sum up, area Tr06 has significant value to the town and community of Tring, being adjacent to the High Street/town centre. Any and all future development plans for this space should only be entirely agreed upon by the local people of Tring.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4450
<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>The Retail and Leisure Development Strategy comment</b>	The Strategy fails to take into account the combined impacts of the coronavirus pandemic.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4522
<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>The Retail and Leisure Development Strategy 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. 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>

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** The Retail and Leisure Development Strategy

**ID** EGS4574

**Person ID** 1145918

**Full Name** Mr Richard Tregoning

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Retail and Leisure Development Strategy comment**

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS4612

**Person ID** 1263004

**Full Name** Jill Townsend

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4659
<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>	No
* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4660
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Retail and Leisure Development Strategy comment</b>	3.1 and 4.1 - what on earth does that actually mean? "Reinforce the role of the town centre and support proposals which will maintain its vibrancy." ?? Gowth Area Tr6 (I am copying the submission of Tring Market Auctions) 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 Station. 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
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4721
<b>Person ID</b>	1264485
<b>Full Name</b>	Charlotte Brown
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4794
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4805
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4853
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4859
<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>The Retail and Leisure Development Strategy comment</b>	In terms of the retail and leisure development strategy, it seems that there is a lack of focus on shorter-term plans around how to revitalise Hemel town centre in the current climate.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4921
<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>The Retail and Leisure Development Strategy comment</b>	DBC agreed at the 2013 Core Strategy Inspection that experience had shown that the small-scale retail provision in Growth Area Bk01 would unlikely to be viable did not bolster the credentials of the unwanted residential development in this location.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS4961
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5022
<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>The Retail and Leisure Development Strategy comment</b>	The development of a supermarket on the Brook Street/High Street site in Tring is wholly misconceived. In addition to the damage it will cause to the historic grain of the town, it will encourage road traffic along Brook Street which is wholly incapable of accommodating it. In the event of new housing development (which I deplore) to the east of Tring, it would make far more sense for new shopping provision to be provided there and not cause the residents to have to drive.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS5055
<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>The Retail and Leisure Development Strategy comment</b>	<p>Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.</p> <p>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>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5088
<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>The Retail and Leisure Development Strategy comment</b>	<p>The current plan appears at to the Retail and Leisure Strategy for Berkhamsted. Central Berkhamsted has an excellent and successful town centre for retail, for daytime leisure (sports facilities andf parks) and for evening hospitality atmosphere</p> <p>We should be supporting our High Street and Town Centre leisure facilities by promoting new housing within walking distance of our retail and our hospitality venues, not by building in sprawling estates extending the size of the Berkhamsted Urban Area. We should be enhancing our current Town Centre daytime leisure and sports facilities rather than sacrificing them in return for easily flooded facilities outside town that all will have to drive to.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5094
<b>Person ID</b>	1264555
<b>Full Name</b>	Rick 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>The Retail and Leisure Development Strategy comment</b>	<p>Section 9, (Retail &amp; Leisure Development Strategy) should contain provisions about public amenity. It is not acceptable to take green spaces out of public use if it's given over to non-inclusive use justified by the Leisure Development Strategy. For example taking a large open green space used by locals for a number of activities being given over as football fields, fenced off and inaccessible to anyone except members of the football club. Spaces should be multi-use where possible, and where exclusive use is required in order to improve the quality of the offering, the removal of the space from informal leisure use needs to be carefully considered.</p> <p>Retail development - as well as acknowledging a changing environment in regards to central/communal retail space, the plan should stress the importance of existing retail space to the character of the area. Any changes that threaten a drastic character change should be resisted and alternatives sought. (Berkhamsted Library, for example.) Development of brownfield sites in the centre of the towns, but without high street frontage, should be encouraged as the ideal locations to develop retail/employment spaces.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS5103
<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>The Retail and Leisure Development Strategy comment</b>	I think that Hemel does not need any more retail space or foodstores (in fact, I think it needs less retail space as there are already vacant shops and there is likely to be much less demand for retail space in the future). I therefore think that the Market Square site should be used for housing and so should as much as possible of the land at Jarman Park.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5154
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5200
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5209
<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>The Retail and Leisure Development Strategy comment</b>	I agree providing with the ambitions in this section of the plan, in particular the additional schooling and healthcare provision, providing it is actually delivered by developers. Clearly my comments elsewhere on reduced housing requirement need to translate through into reduced need for these support services, although not completely as there is currently under-provision of schooling and healthcare within the borough.

In addition, the less visible infrastructure such as water supply also needs to be delivered to avoid more water being removed from the chalk aquifer with further damaging to the remaining green belt and AONB, Chiltern Beeches SAC and general local biodiversity.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS5271

**Person ID** 1264532

**Full Name** Robert Clarke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Retail and Leisure Development Strategy comment** This policy should be re-considered in light of the changed retail habits following Covid 19. The highstreets have many vacancies already without creating additional capacity.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS5326

**Person ID** 1264616

**Full Name** Philip Daw

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>The Retail and Leisure Development Strategy comment</b>	The Strategy fails to take into account the combined impacts of the coronavirus pandemic.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5355
<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 * No	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5395
<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>The Retail and Leisure Development Strategy comment</b>	More people are shopping on line including for groceries and I'm of the view that you are unlikely to need any more retail spaces except for in the new estates that you plan to build. The expanding Manor Estate does need a shop and also a community centre.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5409
<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>	
Yes / No	
* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	<p>I am glad to see you accept that there are structural changes underway in the way we shop (point 9.7.) I also agree with 9.8 Covid 19 implications will not be fully understood for some time.</p> <p>Why then are you surging forth with this? On Wednesday 24th Feb the council were asked to halt the consultation and refused. But you yourselves acknowledge within this section that you aren't in full receipt of all the facts. Why therefore are you continuing on with this?</p> <p>Yes the county needs updated retail and leisure.</p> <p>No it is not properly accounted for here - not only is this section very sparse bearing in mind how important retail is to employment and leisure is to wellbeing. But it does not account for changing needs. Further, by not considering how some retail can be woven into new housing, it massively encourages people to be reliant on driving to retail or leisure. Sorry, but please explain, how does this benefit the environment?</p> <p>Unfortunately it destroys it, again you are demonstrating this is not sustainable or 'mitigating and adapting to climate change' as you have tried telling us.</p>
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5429
<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	
<b>The Retail and Leisure Development Strategy comment</b>	Surely the pandemic will limit shopping areas in town as a large number of businesses will go bust, which will take years to recover from. There is also insufficient space for expansion of retail and leisure in Berkhamsted.
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5452
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5462
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5467
<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>The Retail and Leisure Development Strategy comment</b>	I agree it is best to resist out of centre retail development. The impact of Covid has adversely affected the centre of Tring and it is clearly vital that businesses are supported to ensure that the High Street is not full of empty shops or turned into housing.

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5601
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5615
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5624
<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	Yes
<b>The Retail and Leisure Development Strategy comment</b>	The pandemic has and continues to have a significant impact upon retail and leisure activities and behaviours. Notwithstanding Dacorum's 2020 retail study, it will make sense to revise the Plan to reflect the long term impact of the pandemic and its consequences upon retail and leisure behaviours.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5670
<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>The Retail and Leisure Development Strategy comment</b>	Again, please focus your energies, intelligence and funding on fixing what we already have. Plenty of leisure centres could be improved by utilising the spaces they already have as can many of our shopping centres. Utilise the spaces we have by fixing from the inside, expanding our space will expand our problems and cause more environmental and societal issues!!
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5783
<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>The Retail and Leisure Development Strategy comment</b>	<p>Not fit for purpose.</p> <p>By your own admission the 'Strategy' is based on studies from 2020, but as we sit now in 2021 the fallout from the Covid outbreak turns all these assumptions on their head. If retail groups as big as Arcadia are collapsing you will not by any stretch of the imagination need all the retail space that Dacorum has now in the next 5 years, let alone the new space you are planning. Retail parks are going to struggle to fill the space they have; the cinemas are being killed by Netflix, the shops by Amazon and the restaurants by Deliveroo. The more retail space you build the more you will lead to empty derelict units and the more the physical shopping experience will degrade. Diversify and improve the shopping/ retail spaces you have to save the High Street, don't plan more white elephants.</p> <p>Home working is unquestionably greener and many find it positive in terms of mental health. You should be embracing it not planning to build endless new offices to crush</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5827
<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	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p>The pandemic has changed the way that we use retail; keeping local and supporting small independent businesses. Unfortunately our high streets contain empty units, and these should be used before any new sites are developed.</p> <p>The Brook Street site in Tring is already utilised for retail in the form of the weekly markets, and the historic nature of the museum building and the cattle market are an important landmark in the town.</p> <p>Development of both Tr01 and Tr06 will impact the current supermarkets in the town (Tesco and M&amp;S). It has been shown in the past that the town prefers high quality shops when Budgens closed through lack of investment and support. Any retail in Tr03 will have a large impact on and from the AONB.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS5843
<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>The Retail and Leisure Development Strategy comment</b>	<p>A local plan which downgrades key local services yet proposes significant growth is a recipe for misery.</p> <p>Please keep Berkhamsted Sports Centre open and do not build on the green field adjacent to the Sports Centre.</p>

Development of Haslem Fields will result in less recreational facilities for children who need them even more after living in lockdown. The health and well-being of the local community should be paramount in any local plan.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS6052

**Person ID** 1145998

**Full Name** Mrs Pauline Hughes

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Retail and Leisure Development Strategy comment**

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS6087

**Person ID** 1264816

**Full Name** Christopher Nicholls

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>The Retail and Leisure Development Strategy comment</b>	In Tring there appears to be little or no increase in the retail area and leisure facilities.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6107
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6123
<b>Person ID</b>	1264772
<b>Full Name</b>	Adrian 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>The Retail and Leisure Development Strategy comment</b>	<p>Tring needs further thought in this regard in my opinion. Encouraging a medium sized supermarket in Tr06 or a supermarket in Tr01 is likely to impact existing High St facilities and may lead to existing local independent retailers closing. It is not clear that this has been thought through thoroughly especially when regarding the market history of Tring. Surely a better focus would be on encouraging growth in the local market and / or independent retailers.</p> <p>Reading more widely I understand that the reference to '<i>a new out of centre supermarket in Tring would be justified. We regard the Dunsley Farm Growth Area as the best alternative location.</i>' is based on discussions and assumptions over 5 years old. As suggested by other groups a site near the Bulbourne corner of Tr03 should be actively considered to reduce travel time and traffic.</p> <p>Also the shape of Tring High St has changed over the last 12 months with the loss of restaurants and local shops. Revitalising Tring High St is key to retaining Tring's distinctiveness.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6171
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6184
<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> * Yes * No	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6202
<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>The Retail and Leisure Development Strategy comment</b>	The existing Core Strategy Settlement Hierarchy should be retained as it is much better than the proposed new one, which fails to protect the historic character of Tring and Berkhamsted.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6210
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6236
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6269
<b>Person ID</b>	1264731
<b>Full Name</b>	Graham 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>The Retail and Leisure Development Strategy comment</b>	It is proposed to have the area of Dunsley Farm as a Growth Area. I do not believe such development on the main entrance to Tring from the West is appropriate. It will materially affect the entrance to the town from the bypass. Whether the town requires another supermarket (it has a Tesco and a M&S already, with various convenience stores) even with the council's proposed development is unclear. If one was developed outside then it would probably undermine the use of M&S in the centre of town reducing it's viability, and increase car traffic further.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6316
<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>The Retail and Leisure Development Strategy comment</b>	We applaud regeneration of town centres especially if it offers a mix of housing, leisure and retail or small scale manufacture. Given the town centre function as hub for these activities for surrounding small villages, the role of transport must be acknowledged.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6357

<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	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Build houses in the waste land at Jarman Park! Better than using green belt land. The use of Jarman Park is a disgrace in any event as it was supposed to be retained for sporting facilities!
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6370
<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	Yes
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6402

<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>The Retail and Leisure Development Strategy comment</b>	Berkhamsted is currently at capacity most weekends both in terms of car parking , restautants and pedestrians. The increased housing will further overload the in frastucture in this location.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6443
<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>The Retail and Leisure Development Strategy comment</b>	To promote tourism in Berkhamsted it is necessary to retain its character as a historic market town. More development risks loosing this character
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6466

<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>The Retail and Leisure Development Strategy comment</b>	Assume this strategy will need to be very different post covid. Most of these new facilities come about from building so many houses, and overall the provision per capita will not improve.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6546
<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 * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	The retail provision for Hemel seems practical as we do not know yet what retail demand will be after the pandemic. However leisure facilities are likely to require more space since park area would be reduced by this plan and people may need to exercise with space for some years yet depending on variants. There is a lack of sports facilities in the plan, and demand for play areas and gardens will rise.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS6555
<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>The Retail and Leisure Development Strategy comment</b>	<p><b>Policy SP6 ‘Retail &amp; Leisure Dev’ Strategy’, section 9.14 (Page 46)</b></p> <ul style="list-style-type: none"> <li>Reference ‘a new out of centre supermarket in Tring would be justified. We regard the Dunsley Farm Growth Area as the best alternative location.’ This assumption stems from the last version of the plan BEFORE the expanded Tr03 was included. <b>A site near the Bulbourne corner of Tr03 should be looked at instead.</b> That is where much of the supermarket traffic comes from in any case.</li> </ul> <p><b>Policy SP6 ‘Retail &amp; Leisure Dev’ Strategy’, section 9.14 (Page 46)</b></p> <ul style="list-style-type: none"> <li>Relative to other towns Tring has a high proportion of vacant High Street properties; it is doubtful that additional, traditional retail space is required in the Within Tr02/03 it is a different matter. There is, however, a potential case, building both on Tring’s market heritage and history of local food growth, for modern dedicated market facilities, support for a modern ‘food hub’ (as implemented for example in Stroud or Rotherhithe) and/or other new community facilities such as a Repair Shed.</li> </ul> <p><b>Policy SP6 ‘Retail &amp; Leisure Dev’ Strategy’, section 9.14 (Page 46)</b></p> <ul style="list-style-type: none"> <li>Reference ‘a new out of centre supermarket in Tring would be justified. We regard the Dunsley Farm Growth Area as the best alternative location.’ We strongly disagree with this conclusion, which is based on discussions and assumptions over 5 years old. <b>A site near the Bulbourne corner of Tr03 should be actively considered to reduce travel time and traffic.</b> We agree that additional food supermarket space may be required given that many of the shoppers in Tring travel from north of Tring. However, another supermarket close to the existing Tesco delivers little to the community or to the objectives of the Plan. An alternative might be to re-site the existing Tesco and repurpose the space it currently occupies.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS6563
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6569
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS6662
<b>Person ID</b>	1261257
<b>Full Name</b>	Simon Tuff
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	9.14
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6667
<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>The Retail and Leisure Development Strategy comment</b>	I believe the focus on retail development is inconsistent with the future economic and social needs. With the demise of retail already underway pre-pandemic, and further shifts in consumer behaviours throughout the pandemic, these sections of the plan are out of date with forecasted behaviours. A shift to online retail and greater penetration of home working habits will reduce the need for office and retail focussed town centres - these will instead be workplace meeting venues and leisure focussed centres - providing flexible spaces for evolving workplace and social needs.

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6726
<b>Person ID</b>	1265062
<b>Full Name</b>	Kev Nash
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>The Retail and Leisure Development Strategy comment</b>	There are enough shops for our town, I understand if the population increases shops will need to increase
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6737
<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 * No	Yes
<b>The Retail and Leisure Development Strategy 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.

Your own strategy review says that you don't know what's happening because of the pandemic. How can you proceed in this time of uncertainty as to how the country will look when it ends?

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS6761

**Person ID** 1265036

**Full Name** Tom Burrows

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**The Retail and Leisure Development Strategy comment**

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS6857

**Person ID** 1265090

**Full Name** Amal Hirani

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>The Retail and Leisure Development Strategy comment</b>	Why would the Dunsely Farm area be a suitable location? There is already a supermarket there.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6869
<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	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Dacorum should look hard at the town centre in Hemel, which as the largest centre struggles enormously. The centre is depressing and has no flagship stores of note. Since pedestrianisation many years ago, the centre has deteriorated. Lessons should be learnt from the major development in Watford that it is at risk of failing after the loss of John Lewis and Debenhams. Repurposing Hemel centre should be a priority to focus on what the population need in a modern high street.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6885
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6919
<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>The Retail and Leisure Development Strategy comment</b>	<p>9.14 states that Brook Street is is an appropriate site in Tring for development - has the study taken into consideration the congestion that is already being experienced in this area of Tring, without an increase in a growth of another town the size of tring be cobbled on.</p> <p>No increase in retail facilities required, which means traveling to other towns to benefit from their retail facilities, how does this help Tring businesses?</p> <p>Tring High Street barely manages to cope with its traffic now, frequently blocked with congestion, the road is sinking. Where are the people from the villages supposed to park there isn't enough space now.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6947
<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>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS6970
<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>The Retail and Leisure Development Strategy comment</b>	People travel out of Hemel Hempstead for their major leisure activities. A town of 100,000 people with no plan for a performing arts or large conference venue is a disgrace and a missed opportunity.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS7100
<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>The Retail and Leisure Development Strategy comment</b>	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS7189
<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>The Retail and Leisure Development Strategy comment</b>	Post-pandemic? What will this really look like??!?
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS7228
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS7249
<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> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p>Tring needs further thought in this regard in my opinion. Encouraging a medium sized supermarket in Tr06 or a supermarket in Tr01 is likely to impact existing High St facilities and may lead to existing local independent retailers closing. It is not clear that this has been thought through thoroughly especially when regarding the market history of Tring. Surely a better focus would be on encouraging growth in the local market and / or independent retailers.</p> <p>Reading more widely I understand that the reference to <i>'a new out of centre supermarket in Tring would be justified. We regard the Dunsley Farm Growth Area as the best alternative location.'</i> is based on discussions and assumptions over 5 years old.</p> <p>Also the shape of Tring High St has changed over the last 12 months with the loss of restaurants and local shops. Revitalising Tring High St is key to retaining Tring's distinctiveness.</p>

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS7267
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS7646
<b>Person ID</b>	1265750
<b>Full Name</b>	Mrs Shirley Thomson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	I understand people need homes but also need entertainment, a replacement for the Pavilion was promised , not everyone is interested in sport. Hemel used to be a good place to live but now the young people have got nothing ,it may look nice but with nothing to do and no hospital for the amount of people that will be living here is a disgrace.

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS7672
<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>The Retail and Leisure Development Strategy comment</b>	<b>6 The NLP lacks any vision for the social and cultural development of the Borough.</b> 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 <b>the direct benefit of the public.</b>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS8137
<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>The Retail and Leisure Development Strategy comment</b>	Dacorum also needs leisure facilities, a town without leisure facilities lacks a soul.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS8677
<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>The Retail and Leisure Development Strategy comment</b>	<u>Transport</u> . The county council will welcome the inclusion of a transport paragraph to the supporting text within this section and/or even within <i>Policy SP6: Delivering the Retail and Leisure Strategy</i> . High levels of accessibility and high-quality public places are key to commercial centres, and transport plays a major role in both of those factors.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS9302
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops. 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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS9362
<b>Person ID</b>	1267367
<b>Full Name</b>	Sarah 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>	
<b>The Retail and Leisure Development Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS9376
<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>The Retail and Leisure Development Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS9390
<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>The Retail and Leisure Development Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS9438
<b>Person ID</b>	1267398
<b>Full Name</b>	Alexandra and James Donaldson
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Retail and Leisure Development Strategy comment</b>	— 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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS9671
<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>The Retail and Leisure Development Strategy comment</b>	The recognition in <b>Chapter 9</b> (paragraph 9.11) that the consequences for retailing of Covid 19 are not yet understood is welcomed, but pending a better understanding the Council should return to basic principles, to ensure that new floorspace is only created in sustainable locations within existing retail centres, not out of 'centre' or out of 'town', and not within the Green Belt, as currently proposed in Policy SP6 and Table 4, at Berkhamsted and Tring. Floorspace no longer required for retail use in town centres should instead be used for mixed use development to assist with the provision of housing and ensure the continued vitality of central areas as the Borough's accessible and sustainable hubs.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS9676

<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>The Retail and Leisure Development Strategy comment</b>	In <b>Chapter 16</b> the retail studies relied on by the Council are now out of date and the retail landscape has changed considerably in the light of current circumstances, particularly with regard to the future of town and village centres and local shopping provision. Much more emphasis is required on regeneration and creation of mixed use, sustainable central areas, as noted in answer to Q2.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS10201
<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>The Retail and Leisure Development Strategy comment</b>	Why are you planning increased retail space when retail is changing to online. Whilst I totally agree to supporting local high streets, surely it is not appropriate, at this moment in time, to be extending retail space.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy

<b>ID</b>	EGS10426
<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 * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	You are doubtless aware of the findings of the report by KPMG, which, although arriving too late for inclusion in the Plan, was presented to the County Council's "Growth, Infrastructure, Planning and The Economy" cabinet panel on February 4. This concluded that Hemel Hempstead – which the Plan says "will have grown significantly" – was ranked as the second most vulnerable town in the country. Lack of footfall following Covid was mentioned as a factor, and also that, with the trend for working at home likely to continue and increase, the traditional commuter belt might find itself less attractive, as people choose to live even further from London.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS10452
<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>The Retail and Leisure Development Strategy comment</b>	We must support our local businesses and our local economy. 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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS10597
<b>Person ID</b>	1268726
<b>Full Name</b>	DR ADRIENNE GARNER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	I do not think now is a good time to be planning for more retail space. It is my belief that large retail stores (like Debehams) are outdated. The floorspace currently occupied by these large stores could be re-purposed as residential.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS10645
<b>Person ID</b>	1268737
<b>Full Name</b>	CLIVE PORTER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	Retail and other Town Centre Uses Protecting key shopping areas is one of the guiding developments. But the High Street in Tring has a number of empty shops and no bank. If the High Street cannot be protected, the introduction of new shops is unlikely to help.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS10735
<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>	
Yes / No	
* Yes	
* No	
<b>The Retail and Leisure Development Strategy comment</b>	Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.  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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS10872
<b>Person ID</b>	619474
<b>Full Name</b>	Miss Brenda Mariner
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Retail and Leisure Development Strategy comment</b>	Focus on the Riverside shopping area would be difficult to achieve as this area and the Marlowes centre have long had empty sites and this detracts from the area.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS11028
<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>The Retail and Leisure Development Strategy comment</b>	Two other events since 2014 may also materially affect projections of required development: Brexit and the Covid 19 pandemic. How far are you updating your forecasts to allow for the economic impact of these developments? Together with changes in the retail sector (from in person to online shopping), there may be less demand for commercial and industrial space. In turn, this may free up more Brown Field space than could have been envisaged when the Plan was compiled.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS11372
<b>Person ID</b>	1269016

<b>Full Name</b>	Oliver Galliford
<b>Organisation Details</b>	Senior Planning Officer Hertsmere Borough Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>The Retail and Leisure Development Strategy comment</b>	Hertsmere recognises the importance of Hemel Hempstead as a sub-regional retail centre and the various popular destinations within the borough. It is therefore important that any development gives due consideration to impact on existing linkages between Hemel Hempstead and the wider area, and the need for improved accessibility for those travelling from slightly further afield. Hertsmere supports proposals for focusing development on schemes which would increase the vitality and viability of existing centres given the impact that the last year has had on the retail and leisure sector.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS11439
<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>The Retail and Leisure Development Strategy comment</b>	Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.

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**

**Title** The Retail and Leisure Development Strategy

**ID** EGS11593

**Person ID** 1269148

**Full Name** SIMON AND ANNA BARNARD

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**The Retail and Leisure Development Strategy comment** **Policy DM19 - Mix of uses in Town, District and Local Centres Policy** – Given the impacts of Covid-19 on retail and other businesses, much more emphasis needs to be put on the reuse and conversion of disused properties to help to meet the housing need in sustainable town centre locations and away from edge of town developments. These numbers should count as 'new development' and not as 'windfall'.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS11678

**Person ID** 1269212

**Full Name** PETER SCOTT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops  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.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS11768
<b>Person ID</b>	1118045
<b>Full Name</b>	Mr Padraig Dowd
<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>The Retail and Leisure Development Strategy comment</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>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS11841
<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>The Retail and Leisure Development Strategy comment</b>	<p>Dacorum should have a vision of how to regenerate town centres. We must assume that the retail unit as we know it will never be the same and this has been accelerated because of the pandemic and the shift of buying patterns to online. This is particularly true for clothing and fashion units as well as financial services.</p> <p>This gives Dacorum the ideal opportunity to regenerate these shopping centres/malls and provide substantial living accommodation and at the same time provide what all these new residents will require:-</p> <ol style="list-style-type: none"> <li>1. Smaller food outlets</li> <li>2. Hospitality units providing food and drink</li> <li>3. Fitness/exercise outlets</li> <li>4. A buzz in the town centre in the evenings</li> </ol> <p>The other problem that could be solved by taking a visionary view is parking. Many town centres will have a surplus of parking in multi storey car parks. This is an ideal opportunity to turn some of these carpark floors to resident parking.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS12120
<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>The Retail and Leisure Development Strategy comment</b>	<p><b>1 The Retail and Leisure Development Strategy</b></p> <p>9.7 and 9.14 TSF is very aware of the considerable opposition from Tring people as regards a new supermarket site at the East End of Tring Town Centre, namely the High Street/Brook Street site, mainly due to the historical significance of the existing structures. So according to 9.14, Dunsley Farm site should be considered. This is a non-starter, in our opinion, because:</p> <ol style="list-style-type: none"> <li>1 The proposals for this site already constitute over-development, without adding a supermarket. How many more quarts can we get into this pint pot? The uses that we propose for the site are far more sensible than to boost HCC's income from the site yet further.</li> <li>2 The supermarket would be too small – it would mean a third supermarket in Tring, all at one end of Town, none of which would be large enough to accommodate a family weekly shop. The history of Tesco in Tring is well known to the writer – the site was offered to them in the 1980's but they rejected it for two years as the shop would be too small, finally taking it in desperation as no other sites for a larger store were available.</li> </ol> <p>iii. So as not to impact on sports and leisure, the environment or housing land to a great degree, it seems to us that the only realistic site for a new, larger supermarket in the future would be at the West end of Tring, probably on non – CAONB land to the West of Icknield Way or South of Aylesbury Road. For now though, the Neighbourhood Centre in TR3 would suffice, we suggest.</p> <p><b>Policy SP6 – Delivering the Retail and Leisure Strategy</b></p> <p>Item 4.b. Remove Dunsley Farm from the possible sites.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS12197
<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>The Retail and Leisure Development Strategy comment</b>	Policy SP6 I strongly disagree Dunsley Farm being used for a new out of town supermarket in Tring. A location in Tr03 adjacent to the existing large garden centre on Bulbourne Road would be a better location, serving both new housing at Tr03 north east of Marshcroft Lane and Tr02, plus existing villages to the north of Tring.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS12313
<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>The Retail and Leisure Development Strategy 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>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS12325
<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>The Retail and Leisure Development Strategy 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>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS12872
<b>Person ID</b>	1207443
<b>Full Name</b>	Mrs Jennifer Bissmire
<b>Organisation Details</b>	Clerk Markyate Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No * Yes * No	
<b>The Retail and Leisure Development Strategy comment</b>	Ref Policy SP6 , reference is made to the local towns, district centres and local centres around Hemel as well as Bovingdon and Kings Langley, but Markyate is ignored. Markyate does in its own way have a 'town centre' with a full range of shops, a GymHydro and a range of restaurants and take-aways. During the Covid lockdowns, it has been possible to be almost self-sufficient in Markyate. Two local businesses received awards for their services. The planners show no understanding of our village. The sustainable development strategy fails to even mention Markyate; this needs to be rectified.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS13046
<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>The Retail and Leisure Development Strategy comment</b>	<p>Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.</p> <p>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>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS13090
<b>Person ID</b>	1264779
<b>Full Name</b>	James Froggatt
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<p>Redundant Plans for the Development of Further Retail Sites</p> <p>One thing Hemel Hempstead does not need are more shops and dodgy takeaways so my opinion is that the retail capacity should be concentrated in the town centre and that the development of the retail park in Maylands close to the M1 which at present consists of an Aldi and a McDonalds should be scrapped and used to build new houses.</p> <p>Development of Shopping in the Town Centre</p>

Similarly commercial retail sites leased between the library and the old town should be discontinued and these business concentrated in the area between the bus terminal and the sites of Debenhams and TK Max.

Hemel Hempstead has one of the most diffuse shopping experiences in the my experience of most of the centres in the south of England. Retail needs to be concentrated in the Marlowes and the Old Town. The rest of these areas can then be given over to house building. I am not saying this will be easy but I do think it is possible.

Despite a much vaunted 30m development this centre is still no match for shopping centres in Watford, Milton Keynes or even Berkhamsted High Street. A fully developed multi storey shopping centre should be concentrated and developed here. There should be shops on at least three storeys with a basement car park and further storeys of offices and penthouse suites above them. Further restaurants, swimming pool/ health centre, children's play centre and cinema complex should also be considered. The vision is to turn the Marlowes into a truly vibrant hub that will attract visitors from the surrounding area.

What I have in mind has already been built in Krakow. Poland and I draw your attention to the plans of this facility. One thing the Krakow centre does not have is a walk in medical centre and this would be a welcome addition to the Marlowes complex.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS13212

**Person ID** 1270128

**Full Name** Richard Salway

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**The Retail and Leisure Development Strategy comment**

The Retail and Leisure Development Strategy

Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.

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.

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS13542
<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>The Retail and Leisure Development Strategy comment</b>	<p>Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.</p> <p>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>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS13672
<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	Yes

* No	
<b>The Retail and Leisure Development Strategy comment</b>	<p>Section 9 – Retail and Leisure Strategy Object. pp.45-48, policy SP6.</p> <p>CCB is concerned that this strategy focuses on town centre commercial development and does not provide a context for the consideration of retail and leisure proposals in the countryside, including within smaller villages. This overlooks the important contribution that isolated shops, including farm shops, as well as rural pubs and guest houses, as well as other small-scale commercial leisure activities can make to local economies (including supporting farm diversification) and to supporting the needs of rural residents. Such activities are of particular importance to the vitality of the Chilterns AONB.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS13831
<b>Person ID</b>	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>The Retail and Leisure Development Strategy comment</b>	Policies SP5 and SP6: I am not convinced that sufficient consideration has been given to changing retail and employment patterns and needs post-Covid and post-Brexit.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS13833
<b>Person ID</b>	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>The Retail and Leisure Development Strategy comment</b>	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
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS13891
<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>The Retail and Leisure Development Strategy comment</b>	<p>The Retail and Leisure Development Strategy</p> <p>Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.</p> <p>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>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14046
<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	
<b>The Retail and Leisure Development Strategy comment</b>	<p>The Retail and Leisure Development Strategy</p> <p>Public transport must be improved to connect new homes to town centres and reduce traffic congestion.</p> <p>Cycle routes and secure bike storage must also be implemented.</p> <p>Towns such as Tring require support for their High Street e.g. restuarants and cafes - so there is enough of these places present to accommodate the hugely increased number of residents (and to provide more jobs for residents).</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14051
<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	

<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14052
<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	No
<b>The Retail and Leisure Development Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14250
<b>Person ID</b>	1152075
<b>Full Name</b>	Rob Wakely
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>The Retail and Leisure Development Strategy comment</b>	<p>Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.</p> <p>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>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14419
<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>The Retail and Leisure Development Strategy comment</b>	<p>LCR and NR consider that specific reference should be made to the unique characteristics of draft allocation HH08 when discussing acceptable uses in draft Policy DM19 (Mix of uses in Town, District and Local Centres). In particular, the provision of suitable uses to support the multi-modal transport interchange should not be constrained by the wording of this draft Policy.</p>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14431
<b>Person ID</b>	1270664
<b>Full Name</b>	ASHLEY COLLINS
<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>The Retail and Leisure Development Strategy comment</b>	<p>The Sustainable Development Strategy falls into several subsections and whilst we do not have any comments on the overall presumption in favour of sustainable development, we do have comments in relation to The Retail and Leisure Development Strategy and The Housing Strategy.</p> <p>Whilst our Client recognises the intention of including Apsley Mills Retail Park within the upgraded Apsley District Centre, it considers that this conflicts with the emerging retail market that has been exacerbated by the pandemic and constrains the future potential town centre aspirations. Whilst the Retail Park currently performs an important role within the retail market and out of town retailing certainly has a place in consumers shopping patterns, in this instance it is considered premature to seek to allocate the retail park and also elevate it to a District Centre elevation, thereby protect the retail floorspace in this location without consideration for alternative uses on the Site in the future should the circumstances require it.</p> <p>specific circumstance, there would be very little evidence to support the protections afforded to a District Centre and Primary Shopping Frontage when considered against the identified needs and the mixed use development opportunities that exist in this location.</p> <p>JLL research estimates that there is a 25% oversupply of retail space in the UK. This oversupply means that there is a growing amount of space that is no longer required by retailers and is increasingly becoming empty for long periods of time. In respect of Hemel Hempstead, the floorspace capacity calculations indicate a forecast oversupply of comparison goods up to 2036 which doesn't account for existing vacancies, most notably the Debenhams in the town centre, nor the impact of the pandemic on shopper patterns.</p> <p>The South West Hertfordshire Retail and Leisure Study notes that their forecasts are likely to be inaccurate due to the timing of the study at the start of the pandemic and we would agree that the proposed retail strategy needs more time before being enshrined in policy. Unlike the abrupt move to remote working when the pandemic first hit, online shopping has been steadily growing over the last decade, leaving many bricks- and-mortar stores facing declining footfall. Lockdowns simply accelerated this trend – particularly among older shoppers – while also expediting the rate of store closures with the shift to e-commerce dramatically accelerating existing trends.</p> <p>The further growth in omni-channel retailing will lead to increased polarisation between primary retail locations, such as large city centres and destination shopping centres, and secondary areas, such as regional town centres and retail parks. The supply of retail space in secondary areas will continue to outstrip demand as a result and centres such as Hemel will be acutely impacted by this shift without policy intervention.</p>

There are currently 40,000 vacant retail units across the nation, a number that JLL expects to double by 2026. It is therefore considered irrational in the face of an identified existing oversupply of retail floorspace, together with a town centre that has a high vacancy rate with unimplemented retail permissions, for the Council to seek to elevate Apsley to a District Centre whilst also placing a blanket protection on the Retail Park without consideration for alternative uses, to the possible detriment of the immediate catchment and also the town centre. It is highly unlikely that any future vacancies at the Retail Park will be solved with a retail led solution and therefore alternative uses will need to be considered on the Site.

The Government has introduced a series of measures to foster a more flexible and streamlined framework, which can attract additional activity and further investment – this, in turn, creates good conditions to enable retail places in town centre locations to create a live/work/play ecosystem. The key challenge in reinventing remaining retail space to be resilient and fit for purpose, lies in creating mixed-use destinations that meet community needs and aspirations, such as Market Square or the vacant Debenhams in the town centre. However, the Retail Park is also facing the same challenges and therefore placing a blanket protection over the retail floorspace without consideration as to how create a sustainable community in this location is short sighted.

The Retail and Leisure Study places the greatest emphasis on the forecast oversupply of retail floorspace in 2032, whilst also advising that the loss of existing comparison units should be resisted. These are two

floorspace rationalised as shopping patterns change. It is therefore considered that the allocation of Apsley Mills Retail Park as part of the Local/District Centre also needs to be accompanied by a proactive and permissive site-specific allocation which allows for the introduction of alternative uses such as residential and the potential for a different retail offer or even removal of vacant or soon to be vacant floorspace. This permissive and proactive policy for regeneration would be entirely consistent with the national agenda which understands the need for repurposing retail floorspace and delivery of a new community in a highly sustainable location. It is also considered that the redevelopment of Apsley Mills Retail Park will support the existing local centre by bringing a new community to the area.

<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14524
<b>Person ID</b>	1270690
<b>Full Name</b>	Akzo Nobel CIF Nominees Ltd
<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>The Retail and Leisure Development Strategy comment</b>	Our client supports the Council's retail and leisure strategy (Policy SP6) and specifically the provision of main convenience and comparison shopping facilities, services and leisure uses in Berkhamsted town centre and new development that supports the role of town centre. Future redevelopment of Land at 168-192 High Street, Berkhamsted would complement existing uses, either through a residential- led mixed-use redevelopment comprising circa 80 new homes, including affordable homes and circa 1,500 – 4,000 sqm GIA of new, flexible retail, leisure and community floorspace; or a managed later- living development comprising circa 80 age-restricted apartments combined with common "clubhouse" leisure, retail, healthcare facilities and other ancillary uses at ground level. Both development options would deliver new retail, leisure and community uses; are both deliverable in the short-term, i.e. within the first five years of the new Plan Period; and would bring about significant regeneration to the High Street and act as a catalyst for wider regeneration.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14734
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>The Retail and Leisure Development Strategy comment</b>	<i>Type of centre</i> <i>Centres</i> <i>Role of centre</i> <i>Sub-regional centre</i> <i>Hemel Hempstead</i> <i>Main destination for comparison and convenience goods shopping, services such as banks, leisure and</i>

*cultural activities.*

*Town Centres*

*Berkhamsted*

***A sizeable town centre with a substantial range of comparison and convenience retail provision, services such as banks, leisure***

***and cultural activities serving a wider catchment area.***

*Tring*

*Provision of main convenience and*

*comparison shopping facilities, services and leisure uses for the town and nearby rural area.*

DBC's Settlement Hierarchy Study (SHS) (October 2017) recognises Berkhamsted as the second largest settlement within the Borough with a 'high' accessibility rating and all the higher order services, to include all key services (such as schools, a post office, GP surgery, community and children facilities, supermarket, play space etc). It is stated to be a town centre that performs a district role and therefore has a much more strategic function than Tring which serves a wider catchment, with almost double the population. DBC's SHS states that Tring sits below both Hemel Hempstead and Berkhamsted in the Borough's hierarchy and therefore, Berkhamsted needs to be separated out from the Tring to ensure this is reflected in the retail/leisure hierarchy also.

In satisfying the NPPF tests of soundness, these proposed amendments are recommended to ensure consistency with the draft Policies SP2 and SP3 (as amended) and the technical evidence base which provides the justification for the strategy set out within the new Local Plan.

**Included files**

**Title**

The Retail and Leisure Development Strategy

**ID**

EGS14887

**Person ID**

1144629

**Full Name**

Mrs SOPHIE LAWRANCE

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>The Retail and Leisure Development Strategy comment</b>	Policy SP6 is supported, in so far as the council will in practice take measures to support the vibrancy of Berkhamsted and Tring town centres. However, the permitted supermarket at Gossom's End (which appears no longer to be part of Lidl's plans), will not assist in preventing car use by those living in housing developments such as Bk05, Bk06, Bk08 at the top of the hill in South West Berkhamsted/Northchurch.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS14947
<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 Gorbing
<b>Yes / No</b> * Yes * No	
<b>The Retail and Leisure Development Strategy comment</b>	<b>Retail</b> HCC welcomes the reference to the Dunsley Farm Growth Area (Tr01) being a 'back up' location for a supermarket, if this provision cannot be delivered at Growth Area Tr06, within Tring town centre.
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS15098

<b>Person ID</b>	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>The Retail and Leisure Development Strategy comment</b>	<p>The Retail and Leisure Development Strategy</p> <p>Vibrancy of town centres should consider the current trends exacerbated with COVID-19. There has been a huge shift to shopping online for mass-produced goods and physical banking has reduced significantly. The strategy must ensure the protection of local leisure facilities, pubs, bars and restaurants and shops.</p> <p>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>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS15130
<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

**The Retail and Leisure Development Strategy comment**

Section 10 of the Emerging LP has regard to *Delivering the Infrastructure to Support Growth* where **Policy SP7: Delivering Infrastructure** will require that all new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the development.

In the case of Bovingdon, there are known issues in relation to physical infrastructure (surface-water flooding, traffic problems within the High Street) and community-related (ongoing education provision and growth within the village) which new development of a certain scale can help to alleviate. The Borough Council will be fully aware of ongoing discussions with BPC over a number of years and during the initial stages of the preparation of the Emerging LP and the NP.

Discussions have also been held with the promoters of the land at Grange Farm over a period of time regarding the development of that site. BPC is aware that the level of development that is envisaged at that site will help to meet growth needs over the Plan period, whilst also providing opportunities to address the known infrastructure issues within the village. BPC is supportive of an appropriate level of development that will alleviate those issues, subject to the Emerging LP ensuring that such matters can be addressed in full through the Infrastructure Delivery Plan and appropriate financial contributions to support those works should the site be allocated in the LP in due course.

It is critical that the delivery of any new homes within Bovingdon must assist in the significant improvement of the infrastructure issues that currently exist within the settlement. The Borough Council is aware that the allocation of land at Grange Farm will assist in the delivery of improved education provision within the village, but it must also be used to enhance other aspects of community life including, amongst other things, improvements to the existing village hall/community centre and scout hut; improved health facilities; environmental improvements to the High Street including parking and provision of allotments. All of these items are matters of importance to the future of Bovingdon, and BPC would expect that the allocation of the site at Grange Farm will enable these benefits to flow through to the community.

**Included files**

**Title** The Retail and Leisure Development Strategy

**ID** EGS15285

**Person ID** 1161497

**Full Name** Mr Robert Sellwood

**Organisation Details** The Crown Estate

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**  
\* Yes

* No	
<b>The Retail and Leisure Development Strategy comment</b>	<ul style="list-style-type: none"> <li>• <b>Policy SP6 : Delivering the Retail and Leisure Strategy</b> : Whilst TCE welcome the recognition in 2(d) that new retail facilities will be provided in the Hemel North Growth Area, the Table comprising 1(a) should additionally state that new Local Centres will be established in Hemel North Growth Area. It is also noted that this policy refers to the 'Hemel North Growth Area' whereas other policies (such as SP4) refer to it as North Hemel Growth Area. The references should be consistent throughout the plan to avoid confusion.</li> </ul>
<b>Included files</b>	
<b>Title</b>	The Retail and Leisure Development Strategy
<b>ID</b>	EGS15457
<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>The Retail and Leisure Development Strategy comment</b>	SEE ATTACHED RESP
<b>Included files</b>	

# 10 Delivering the Infrastructure to Support Growth responses

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1
<b>Person ID</b>	1249466
<b>Full Name</b>	Mr Lawrence Stromski
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The infrastructure delivery plan does not go nearly far enough to address the over-burden placed on local infrastructure by proposed new development.</p> <p>Taking Berkhamsted as an example, improvements to the M1 and M25 junctions would do nothing to alleviate traffic in the town. The town high street is already a traffic jam during most rush hours.</p> <p>What is required is serious and sustained development of new local bus routes and local cycle infrastructure. New developments need to promote local cycling and walking where possible and new local bus routes need to be established urgently to link the areas stations (Tring, Berkhamsted, Hemel Hempsted, Apsley and Kings Langley) with the proposed new developments.</p> <p>No new housing development can be considered “sustainable” without such measures. To be quite plain: where are you going to put all the cars?</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS45
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>In section 10.3 it states <u>“services and facilities provided by private and public bodies and includes: green infrastructure including multi-functional green spaces, ecological enhancements, open green spaces (e.g.parks, allotments, and country parks)”</u>. I just don't see this on the Strategy plan all I see is large numbers of housing being built.” <u>transport infrastructure (rail, roads, cycle routes, buses, footpaths/pedestrian links)”</u> The last attempt at an infrastructure road change was to shut down Fishery road and send the traffic down through boxmoor village. We all know how that panned out with the public outrage.</p> <p>Section 10.4 bullet points: <u>” A package of interventions across our towns and villages alongside growth that focus on promoting movements by means other than the car”</u> The use of car a mind-set will not change people will see it as the most convenient mode of transport and is there at point of use.</p> <p><u>“New primary and secondary schools throughout the Borough”</u> We have built housing on 5 of our old secondary schools as I said before where are these schools on the Strategy plan. <u>“The provision of new health care facilities across the Borough.</u> What with the South Hertfordshire partnership which includes St,Albans and Watford will this body champion the cause for a new dedicated hospital to serve the people of Watford, St Albans and Dacorum that we so desperately need??? In the SP7 policy I see more mention of Development and nothing about the green open spaces. There needs to be a more detail in this policy to understand the actual effects on the existing inferstructure.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS81
<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> * Yes	Yes

* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Tring High School is already the largest/second largest in the County and Rothschild surgery is the largest in the County. That is a sign that Tring is under stress and needs additional investment in infrastructure. Additional housing will only increase the requirement and we are already committed to additional housing currently being built out at Roman Park on the LA5 site
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS91
<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	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS106
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	This emerging plan cannot be considered valid without completed IDP to demonstrate it is deliverable. Currently traffic on New Road in Northchurch is busy and the on road parking makes it a dangerous road. It is a main pedestrian route for a school and the air quality at this junction is poor. Air quality is not even referenced in this part of the study.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS126
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The infrastructure in Berkhamsted is currently inadequate to support the town. Significant investment will have to be made, particularly if it is to support the proposed housing expansion. Its road infrastructure is particularly poor with many being dangerous for both pedestrians and cyclists.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS174
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	We already have natural green spaces - which are much better than man-made, unnatural spaces. The A41 is already overwhelmed and chaotic. The streets in Berkhamsted are often packed and dangerous - especially to pedestrians. Your housing development plans will serve only to worsen this situation.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS179
<b>Person ID</b>	1257687
<b>Full Name</b>	Elizabeth Cullen
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS197
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Speaking for Tring and Berkhamsted, for whom huge population growth is planned, there are no adequate detailed plans of road improvement, school facilities, especially at Secondary level, or medical facilities.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS232
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Recycling from Tring households</b></p> <p>The plan needs to include greatly increased and improved <b>recycling facilities</b>. Tring's own recycling centre was removed when Aston Clinton's modern facilities at College Road opened but the latter is now only available to residents of Buckinghamshire. Berkhamsted's Northbridge Road facility involves dragging waste up steps and will get busier with Berkhamsted's planned 2,200 houses. Either Hertfordshire needs to pay Buckinghamshire for Tring's recycling or a modern, larger facility needs to be provided locally for Berkhamsted and Tring. This could also improve DBC's recycling rate from its current 52%.</p> <p><b>Over-development of Tring</b></p> <p>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.</p>

I have also commented elsewhere about the need for **appropriate infrastructure** 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 **Tring's character**.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS235

**Person ID** 1258552

**Full Name** Rachel Conradi

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** Please explain to me how this will help Bovingdon's already overstretched infrastructure? No new roads or improvements to existing ones (despite there only being three ways into or out of Bovingdon), no new schools (despite a SW Herts requirement for more senior schools and Bovingdon's severe need for additional secondary school places in the area), no new doctors, dentists or other needed services. What about flood management? One of the proposed site is next to land that floods on every large rainfall... What about provision of clean water and sewerage which is apparently at stretching point for the village already?

*What about provision of clean water and sewerage which is apparently an extremely acute issue for the village and barely managing to keep up with current demand (I was told a few years ago that both of these are problems for the village and being on the top of the hill and relatively far from any town makes it harder to sort the issues out)."*

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS238

**Person ID** 868491

**Full Name** Mr Graham Hoad

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>SP7 Community infrastructure considerations are very important especially considering the targets for increased housing. DBC should be pro active in identifying needs and current shortfalls ahead of further housing development.</p> <p>I have a particular hope that DBC will support incentives in Tring for a town centre located Arts Centre. We have good local theatre, numerous small scale venues but need a multi use Arts facility as a central focus of the town.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS253
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>There is a perception that when permission is given for a housing development which includes provision for schools, health centres and community facilities there will be a subsequent application to get rid of these to make room for more housing. This should not be allowed to happen.</p> <p>The value of green infrastructure should not be underestimated.</p> <p>Pressure must be put on the Government to over-ride the West Herts Health Trust and insist that a new hospital be built to cope with the increase in population. The Trust have never come up with a good reason for blocking this but they continue to do so. We can only speculate on their reasons.</p> <p>There should be a unified plan to provide telecomms and broadband infrastructure rather than the disjointed approach we have now.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS272
<b>Person ID</b>	1258896
<b>Full Name</b>	Katie Reid
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	There are no plans for a new doctors surgery. 'Healthcare' is your way of getting around that fact. We are already so stretched in Tring and your plans clearly won't improve services, they will only hinder them further.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS288
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Hemel is commuter belt; I commuted to central London for many years. I think affordable, quality parking within walking distance of the station (not necessarily owned by network rail) would improve quality of life of residents. If this could be fronted by office buildings facing the moor that would be great. Without any such schemes pressure on parking in areas surrounding the station will continue to grow and expand.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS307
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	This addresses some the infrastructure proposals required for Hemel Hempstead but nothing to the already busy towns of Tring and Berkhamsted. Berkhamsted in particular, already has major traffic and parking issues.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS346
<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

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Comments on SP7</b></p> <p>Agree with the intent of this policy. However we will raise two points which strike the reader.</p> <p>First, this feels very much like a "car rich, carbon" infrastructure plan. Where roads take preference over other aspects. There is mention of specific projects for road travel in 10.4, and a nebulous "package of interventions...promoting movements by means other than the car". There needs to be equally specific detail for these non car based infrastructure plans.</p> <p>Secondly, there seems to be plenty of wriggle room for developers to argue that they can develop land without implementing the required infrastructure in a timely or integrated manner e.g. SP7 paragraph 4. "where it can be demonstrated that the infrastructure requirements could render the development unviable..." This is cause for concern and needs to be addressed. To a lay person what this suggests is this. That the developers can quite easily take the Garden out of the Hemel Garden Communities. Communities which are already using green belt land.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS354
<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
* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Policy SP7 is Supported, as any new Housing on Land lying to the West of Chequers Hill that is being put forward for the Council to consider, will provide the required on-site and off-site infrastructure, etc.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS368
<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	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS407
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Policy SP7 is Supported, as any new Housing on Land to the East of Chequers Hill in Flamstead, that is being put forward for the Council to consider, will provide the required on-site and off-site infrastructure, etc.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS447
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>It is important that these "promises" of infrastructure are met. Healthcare facilities and schools are already oversubscribed. These facilities should be built in advance of the developments or at least at the same time to avoid over crowding and the use of temporary classrooms in the existing schools. Will there be a hospital to replace the depleted Hemel and the awful Watford General?</p> <p>Additional community facilities for both adults and children will be required: day centres, sports halls, youth centres, scout huts. These are nice words but where is the commitment to provide them in the plans? These facilities which are essential for the quality of life that the plan desires have a habit of being overlooked when the building starts.</p> <p>There is no mention of cycle or walking infrastructure in this section of the plan which does not support the sustainable transport promises made in other sections.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS506
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	I believe the Planned Growth of population in the area is relying on out of date information. The consequence of pursuing the favoured sites in SW Berkhamsted will not deliver the outcomes envisaged and in fact will lead to major problems as a result of topography.
<b>Included files</b>	<a href="#">1. Planned Growth and Supporting Infrastructure.docx</a>
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS520
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	There is very limited investment planned in the infrastructure that would be required to service this huge number of houses. The A41 and mainline train line are already at capacity for example and the roads through Tring and Berkhamstead grind to a halt at times.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS545
<b>Person ID</b>	772477
<b>Full Name</b>	Mr. Roy Warren
<b>Organisation Details</b>	Planning Manager Sport England

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Policy SP7 is supported as it would help ensure that infrastructure including facilities that support community sport and physical activity are provided to meet the additional demands created by new developments. In particular, the confirmation in part 5 of the policy that a SPD will be provided to provide more detail on the Council's approach to securing contributions is welcomed as this will be necessary for setting out the detail to support the operation of this policy in practice. Sport England would be happy to provide advice to the Council in due course on the approach to securing developer contributions towards community sports facilities in a future SPD.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS577
<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>Delivering Infrastructure to Support Growth Strategy 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. I have particular concerns regarding the impact on water supply and waste water disposal.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS587
<b>Person ID</b>	1260922
<b>Full Name</b>	colin Lillicrap
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The plan does not deliver the infrastructure needed to support the proposed increase in population. The proposal to build 1200 plus houses between Shooters Way and the A41 bypass without improving the roads exposes one of many flaws in this plan. With current traffic densities there are already long queues at the junction of Kings Way and Kings Road at peak travel times. The major route to the high street from Shooters Way is Cross Oak Road. In places this is a single track with no pavements. This section is currently in poor condition and has inadequate street lighting. At the other end of Shooters Way Bell Lane and Darrs Lane are single track roads with no pavements. If this plan is to go ahead in any form there is a need for new junctions onto the A41 at Castle Hill end of Berkhamsted and Durrants Lane end of Shooters Way to avoid overloading local roads that cannot be realistically upgraded.</p> <p>Hertfordshire desperately needs a new hospital. We have one of the lowest levels of medical services measured in terms of number of beds, doctors, MRI scanners etc per head of population in the whole of Europe.</p> <p>Berkhamsted will need a new secondary school but the suggestion this should be at Darrs Lane is insane.</p> <p>The plan does not explain how the necessary increase in infrastructure will be delivered or even if it is possible in the case of upgrading existing roads in densely populated areas.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS597
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Woefully inadequate for the housing proposed, where will everyone learn, play, park their cars etc.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS626
<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	
<b>Delivering Infrastructure to Support Growth Strategy 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?</p>

You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by such radical numbers will result in far more congestion and pollution – flying directly in the face of your environment plan. It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.

Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between properties, minimal parking and a minimal green space. Once they have been paid, they will leave and having irreparably changed the face of the town, we, and future generations will be left to suffer the consequences.

These new estates seen all over the country are the modern equivalent of tower blocks build in the 60s. We will look back in 50 years and wonder why anyone thought they were a good idea. The example to the west of Tring is a key demonstration of this. Decorating the house that face the main road with a pretty stone façade is just that, a façade. Look within the roads and you see narrow houses, squashed in at the edge of town, forcing people to drive to town. Maximising profits for developers, ignoring the real needs of the town inhabitants.

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

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

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS711

**Person ID** 1261251

**Full Name** Lesley Ashden

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Great care needs to be taken to ensure that the roads are clearly thought through to include consequential effects on minor roads and small villages, particularly those with only one through road and traffic pressure from surrounding leisure amenities such as the National Trust at Ashridge, such as Little Gaddesden. At times there is severe traffic congestion (and I mean cars nose to nose and unable to move due to cars behind) due to a single lane effect from parked cars outside the village shop and at the junction of the Monument drive to Ashridge and the New Road.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS730
<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> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Whilst infrastructure is continually being delivered through the development management process, how does the council know that this fits with the needs of the borough if there is no strategy yet in place?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS743
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Given the relentless cut backs to basic services (health, policing, education, basic council services) since the 90's and slow rollout of reliable broadband/mobile network coverage, whilst vast infrastructure investments have been made in pointless and destructive projects such as HS2, I have no confidence that Dacorum will be able to deliver sustainable infrastructure to support the ridiculously opposing objectives of vast numbers of new inhabitants in an already overburdened area.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS764
<b>Person ID</b>	1261254
<b>Full Name</b>	George 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>Delivering Infrastructure to Support Growth Strategy comment</b>	The Infrastructure Delivery Plan acknowledges a number of improvements, e.g. to water and sewerage, are as yet unfunded and no development of the scale proposed should be considered without these being both funded and in development as they typically take many years to complete. We know in Oxfordshire that major issues have been caused by inadequate sewerage infrastructure being overwhelmed in heavy rain and running into water courses and roads. Of particular concern is healthcare infrastructure, which not only relies on adequate buildings, but a ready supply of suitably qualified staff to man them. We know there is a national shortage of qualified GPs and nurses and this fact should be

recognised as equally important as buildings. Furthermore, Tring is on the border of Buckinghamshire and Bedfordshire and our local practice, Rothschild House Group, attracts patients from both these counties and new housing developments in places like Aston Clinton and Pitstone create further demand for Tring GP services.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS791

**Person ID** 1260046

**Full Name** Jude Jackson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** whilst you make provision for increase in primary schools, there is no mention of further secondary schools. What will happen to all the extra children when they leave primary school.  
I think expecting the developers to provide infrastructure is dangerous as this will be done as a minimum and at the lowest possible cost.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS800

**Person ID** 1261302

**Full Name** Robert Bailey

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Vital to include planning for water and sewerage needs without depletion of our local chalk streams. I can see no mention or detail of this in your plan.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS873
<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> * <b>Yes</b> * <b>No</b>	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS882
<b>Person ID</b>	1261478
<b>Full Name</b>	Mr Stephen James
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I write as a resident of Berkhamsted to comment on the above plan to support the proposals from Thakeham and BSGCA for an allocation to the East of Berkhamsted. I support this because it will:</p> <p>Create new and exciting local sports facilities for the people of Berkhamsted</p> <p>As the demand for sports facilities increases the space allowed for in the Thakeham scheme will be able to be used.</p> <p>The Thakeham proposal will allow for new green open spaces and a new country park</p> <p>The new sports facilities will largely be for the benefit of the young people in Berkhamsted</p> <p>A further benefit of the Thakeham scheme is that it will reduce the traffic strain by providing a much needed link to the A 41</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS907
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>There is inadequate recognition in the draft Plan of the greatly-increased demand that would be placed on both water supply and waste water management. Both of these are close to breaking-points now, with water abstraction from the chalk aquifer at levels which, according to the Environment Agency, would not be permitted if licences to abstract at current levels were to be made today. Major expenditure, not allowed for in the draft Plan, will be required for sewerage/waste water handling.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS973
<b>Person ID</b>	1207613
<b>Full Name</b>	Ms Nina Crabb
<b>Organisation Details</b>	Planning Adviser The National Trust
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	There needs to be a strategic approach to the provision of open space. This should take account of population growth and amount of green infrastructure/open space available. The provision of open space should also take account of pressures at existing sites such as Ashridge. The District relies to a large extent on Ashridge to provide its public open space, but this is experiencing pressures and damage due to the number of recreational visits. A new destination open space such as a country park is required early in the plan period to reduce further pressure at existing sites.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1149
<b>Person ID</b>	1261804
<b>Full Name</b>	Mr Edward Parkes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	4. Impact on infrastructure. I have grave concerns over the lack of roads to support the material increase in traffic that this development would create. Also what impact would this development have on our water supply and waste water disposal?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1184
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>It is vital to provide the necessary infrastructure for the proposed housing development in Berkhamsted .The only transport infrastructure provided is walking and cycling routes in a town that the plan acknowledges requires car journeys due to the topography the area . All developments are on the outskirts of the town . As stated before the transport plan is not sustainable .</p> <p>The green infrastructure provided in Berkhamsted is not sufficient for the 25% increase in housing .The wildlife corridors suggested in the housing developments along Shootersway in Berkhamsted do not lead anywhere to link wildlife areas . These corridors and small green spaces in the housing developments in no way compensate for the loss of wildlife habitat .</p> <p>Water supply in Dacorum is from aquifers. Will these supplies be sustainable?</p> <p>The plan fails to adequately address issues for Berkhamsted in particular with regarded to transport , green infrastructure and water supply .</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1194
<b>Person ID</b>	1261840
<b>Full Name</b>	Rachel 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>Delivering Infrastructure to Support Growth Strategy comment</b>	I am sure any plans will make nominal provision for managing water, waste, traffic etc listed in 10.3 but I have experienced continual issues regarding waste and traffic in particular relating to small developments in Berkhamsted and I am suspicious that the infrastructure required for such an extensive urban growth in Dacorum will be well supported. How can you be sure there is not an impact on the environment from the increased uptake of water for all the new housing for example? I shall be alert for more details on this and the other areas such as cycle ways and waste disposal being published. Infrastructure does not sufficiently consider green spaces and also the possible destruction of existing hedgerows and footpaths when creating the developments eg at the top of Swing Gate Lane Berkhamsted. Doctors surgeries are also an area currently challenged and there is no clear additional provision in some areas.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1208
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Inadequate infrastructure is a major concern for the development of Berkhamsted. Most of the proposed development will be at some distance from the town centre. Living on the outskirts of Berkhamsted, I am aware that very few of my neighbours walk or cycle into town - most drive and therefore it is highly likely to also be the case for those in the proposed new housing, especially since much of it will be at the top of significant hills. There have also been concerns raised in

the past about the availability of water supply and sewerage for any extra housing. While this is perhaps the responsibility of the utility companies primarily, it is obviously a huge concern to the population and there is little in this section to provide reassurance.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS1235

**Person ID** 1259116

**Full Name** Tring in Transition (TinT)

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS1263

**Person ID** 1261930

**Full Name** Chris Gee

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The addition of potentially 2250+ dwellings in Tring will significantly impact local infrastructure which your plan has not adequately addressed;</p> <p>a. Tring Senior School additional demand</p> <p>b. Tring Railway Station (passenger numbers and train capacity means at peak times you already can struggle for seating), including the small station ticket office, bike park facilities, car parking facilities.</p> <p>c. Station Road is wholly inadequate for the additional peak am/pm forecasted traffic volumes</p> <p>d. Local town centre car parks in Tring, Berkhamsted and Kings Langley are not be capable of sustaining the increase in populations and vehicle parking</p> <p>e. Tring has a single petrol station, which already can see vehicles turned away in peak times; this would not be able to accommodate the increased demand</p> <p>f. Peak traffic flows on the A41 am can lead to traffic queues from the M25 end junction back to the Hemel Hempstead junction; this would increase significantly with the additional population increase, leading to further traffic diverting back through Apsley and Kings Langley in the mornings.</p> <p>g. The High Streets in Tring, Berkhamsted and Kings Langley are generally kept in a poor state of repair, based on current traffic usage; this would only increase the deterioration of the main commercial roads.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1278
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The infrastructure of Berkhamsted is already reach capacity and certainly cannot cope with such a large increase in residential properties. There is a serious lack of car parking in the town, dentist and doctors are full to capacity, sewage

system is very old and needs replacing. The rivers are very close to drying us in the summer. There is no space to widen roads or create new roads off the main high street.

The draft IDP demonstrates how impractical it is to force significant growth on to settlements such as Berkhamsted which in many respects is at capacity now. Too much of the required infrastructure is either impossible to achieve, such as road widening, or requires significant investment by third parties. For example, sewage and wastewater treatment and network are at full capacity, as acknowledged in paragraph 15.65 of the IDP. The solution offered is simply that Thames Water and the developer will deliver without any evidence that the infrastructure can actually be delivered. Potable water supplies rely on extraction from aquifers.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS1328

**Person ID** 1145350

**Full Name** Mr Edward Murray

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS1383

**Person ID** 1254217

**Full Name** Jamie Gray

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<b>Infrastructure</b> Water and Sewerage systems will not cope with the proposed increase in housing until the infrastructure is improved. This is not addressed thoroughly in these plans and would take a decade or more to implement after detailed plans are agreed. Extracting more water from the chalk system would increase the damage to protected chalk streams.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1415
<b>Person ID</b>	1262067
<b>Full Name</b>	MOYA WILLIS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I would also like assurances that there will be sufficient GP surgeries and equally importantly, now that the hospital trust are going ahead with their plans to modernise Watford General Hospital how do the authorities propose to manage the extra load. Some 23 years ago I tried to drive from Berkhamsted to Watford hospital to visit my very sick father in law on a Saturday afternoon when Watford football team were playing at home and after 1 hour stuck on the Hempstead Road I managed to do a u turn to return home as ALL the roads were grid locked.  These are life and death situations so I really would appreciate your comments.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS1464
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The housing numbers are too high. The infrastructure does not and will not support this growth and will do further damage to the local environments, communities and characters of our towns.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1470
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS1484
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>How do you propose to accommodate the extra traffic generated by 2000+ more houses in Berkhamsted? Have you got a firm commitment from Hertfordshire County Council to increase and improve the road system, or are we always going to be hours moving around , getting stuck in lanes which are only one way, and queueing for the slip road to get onto the A41 ?</p> <p>Will there be enough schools - not so long ago you were proposing to taxi small children through to Hemel Hempstead to attend school. How many more children are you anticipating in these new houses? Equally it applies to GP services etx.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1497
<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	No

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1515
<b>Person ID</b>	1262227
<b>Full Name</b>	James 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>Delivering Infrastructure to Support Growth Strategy comment</b>	Specifically, I look at the proposed developments on Green Belt land around Berkhamsted and state categorically that there is insufficient consideration in the Plan for the provision of new or of upgrading the current infrastructure to support the scale of the proposed developments. Berkhamsted is already a Town which is at capacity in terms of schooling, road services, water supply and wastewater disposal.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1602
<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>	

Yes / No * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<b>Policy SP7 Delivering Infrastructure</b> Infrastructure requirements relating to individual sites should relate directly to the scale of development proposed and relate to specific requirements arising from the individual proposals. Where wider infrastructure requirements might need to be provided within an area this should not prevent development on individual sites being delivered in a phased manner. Policy SP7 assumes developers will collaborate on the provision of infrastructure which is needed to serve more than one site. No mechanism is proposed within Policy SP7 as to how this will work in practice. BFI considers it is important to ensure that delivery of individual sites is not prejudiced pending agreement of wider infrastructure needs.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1634
<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>	
Yes / No * Yes * No	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1651
<b>Person ID</b>	1261232
<b>Full Name</b>	Mark Burrage

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Policy SP7 - Delivering Infrastructure</b>  <b>Policy should not settle for avoided or mitigated impact. It should actively ensure that infrastructure enhances the environmental, social and economic assets. Should infrastructure not met this bar then it should be opposed.</b></p> <p>A policy should be include specific reference to infrastructure to support environmentally sound and healthy communities. Policy should aim to ensure that healthy sustainable choices are the most available and easiest choices. Unsustainable and unhealthy choices should be actively penalised or banned.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1679
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>INFRASTRUCTURE.</p> <p>In a few places the plan pays some homage to the opinions expressed in many of the 22,000 responses to the 2017 consultation regarding the overriding importance of providing suitable infrastructure to accompany development. Indeed the first meaning of the word “infrastructure” signifies a “basic framework”. However, it is still apparent from the lack of detail in the current plan that infrastructure is not being accorded the overwhelming priority it requires. Many of the plan’s lists (e.g.Int.SA 2.2 p.8 &amp; NTS-2 2.2)put infrastructure at the end of a given section -indicative of its low priority in the</p>

minds of the authors. As many current residents have long ago observed infrastructure must keep pace with development. The specious words of SP7 have not been in evidence so far and 7.19 admits as much. Developments should not be permitted until a full and proper assessment and provision of the required infrastructure has been carried out. Indeed DM9 states that developments must contribute and not place added burdens on infrastructure.

In the plan's own words "the IDP is also a key tool in the assessment of development viability"(and(at 1.13 )stresses the need to consider total infrastructure at the same time as development)and yet the full infrastructure plan is still ongoing( 1.45 & 23.3)and has not yet been fully developed and published even though(at 23.2)"delivery strategies should be read alongside...Infrastructure requirements." Here again the fundamental importance of infrastructure is being accorded insufficient priority. Failure to articulate a concurrent infrastructure plan in any detail makes a mockery of the statement on p.221 "Growth will be infrastructure-led."

On the contrary, throughout the plan, infrastructure is being growth-led.

The overriding thrust is that growth is required in order to provide the infrastructure which that very growth, and previous growth, demands. This is laid bare at 1.13 and even at p.26 of the Vision. Notwithstanding the fine words at 10.1-"A key requirement of the DLP is to ensure that there is sufficient infrastructure in place to meet the planned growth" the contorted logic of the plan emerges again at 5.3 "growth to deliver investment in infrastructure. " SP2 and the table on p.6 support this interpretation. The sustainability appraisal at Int. SA p.43 "significant growth is also planned for Berkhamsted and Tring which will enable the delivery of new infrastructure" offers yet more confirmation of the misguided policy direction and priorities and, implicitly, an admission that current infrastructure is already inadequate.

Furthermore, Int. SA C 37 says "The options with the higher levels of growth at Berkhamsted and Tring provide the greatest potential to deliver new secondary schools which would address the identified deficits for these towns." Int.SA D 15 makes the same point in respect of green infrastructure. NTS18 realistically recognises "the pressure which will be placed on existing facilities as a result of increased housing and population." Yet Int.SA p.56 confirms the application of twisted methodology once more in flagging "the unknown nature of the infrastructure that will be delivered to support growth and the relocation of existing sports facilities to accommodate housing in Berkhamsted."

At 5.3 the release of Green Belt land is predicated on the requirement that it "delivers sufficient growth to provide much needed investment in infrastructure" That should be no reason to release such land.

In fact we need to exceed the requirements of 2.17; since the infrastructure of the Borough is already deficient in, for example, water (v.18.40) and sewerage and drainage provision, public transport provision( 21.33), healthcare (particularly access to GP's(22.19), acute care ( 22.14,23.52.), social care (which receives scant mention throughout-14.36 apart), sports provision (22.44) and highway maintenance, future infrastructure needs to outstrip the requirements of future development (v. Policy SP7) in order to make good existing shortfalls.

"Timely"(SP7.3,23.4)provision of adequate infrastructure, which features heavily in the Vision, should be a pre-condition of granting planning permission not an afterthought seeking to make good the deleterious effects of development, as implied by SP7.Development should not be permitted until contractual obligations to provide the necessary infrastructure are wholly met. It is also vital that any enhancement of existing infrastructure or creation of new infrastructure obey the same rules for sustainability as the developments it is intended to serve.

Furthermore the cumulative requirements of development need to be considered and addressed in each and every case but not in a piecemeal fashion. Notwithstanding the lip service paid in 10.1,10.7 merely refers to large developments-a series of smaller ones(as planned for most of the Berkhamsted sites and euphemistically described at SP4,1 (j) as “urban extensions”)will inevitably result in a further shortfall in the required infrastructure.SP7.4.c. offers too much of an escape route for reluctant providers of necessary infrastructure.

Failure to provide or comply with the required and promised infrastructure should be rigorously enforced. Too many times have developers promised infrastructure or environmental contributions only to fail in their delivery without incurring penalties or demands for rectification. This applies especially to landscaping and biodiversity provision.(e.g. Bearroc Park 1.)

Developers make large profits. Contributions through the CIL levy and section 106 as implied in 2.17 should be higher and spent more wisely and effectively than past experience demonstrates. (The needless High St/Stag Lane junction arrangements in Berkhamsted are an egregious waste of money, contributing to increased emissions when a simple mini-roundabout would have sufficed as at the much busier St John’s Well Lane intersection.) In order to calculate the cumulative impact (as required above) the precise impact of a particular development needs first to be assessed very carefully in advance so that full and proper mitigation measures can be taken on site. Any resulting extra contributions generated should not be frittered away elsewhere by allowing a raid on the residual communal pot without compelling justification. Similarly, making a contribution elsewhere should not be used as a device for avoiding provision of the proper infrastructure on site or as a result of a particular development.

One must conclude that the present infrastructure deficit exists because appropriate contributions from developers’ profits were not identified, required and made in the past.(v 2.17). Such laxity must not be allowed to recur. The existing council tax paying community is surely entitled to demand more from developers to offset the damage inflicted on amenity, biodiversity ,the environment and quality of life. Excess developer profits should be re-directed for the benefit of those who suffer most from new developments-the existing population.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1757
<b>Person ID</b>	1262366
<b>Full Name</b>	Isabel Frankel
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1781
<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>	
Yes / No	
* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<ul style="list-style-type: none"> <li>The section on Infrastructure to support for the proposal does not adequately address issues, including: traffic, water and wastewater, and is incomplete. It reflects the reality that infrastructure always lags the development it is meant to serve. This is very obvious in Berkhamsted. This will disadvantage the existing residents. It is not made clear where the Council will obtain the money to implement the changes to infrastructure. The cost of inconvenience caused does not appear to be clearly calculated.</li> <li>Delivering Infrastructure to support growth – the IDP fails to 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.</li> </ul>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1808
<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	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1829
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The lack of a definitive Infrastructure Plan reflects the reality that infrastructure here lags the time it is required and may never catch up. Too much of what has been identified relies on Central Government funding which equals uncertainty and the latest proposals to replace Sec 106 and CIL are awaited. In the circumstances how can a plan with major growth targets be signed off.</p> <p>There is also too much reliance on statutory undertakers to perform with particular risks for this Borough in respect of potable water supply and sewage treatment.</p> <p>In Berkhamsted suggested infrastructure requirements relate to sites in different ownership with probably different timing meaning coordinated delivery of infrastructure and developer contributions will also be fragmented. Some infrastructure aims such as sustainable transport and non-vehicular travel will not happen in the Town given its valley location and topography. Growth should not be forced on an area which cannot accommodate it.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1889
<b>Person ID</b>	1262518
<b>Full Name</b>	Rachel Kempster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Berkhamsted's infrastructure is already stretched to the limit. The proposed plan does not appear to deal with this. New housing developments on the outskirts of town will lead to more cars driving to the centre of town, leading to increased pollution and congestion.</p> <p>There is a question re-potential water supply and sewage in Berkhamsted as identified by CPRE Herts. This has not been addressed. Why build houses where water supply and sewage are an issue?</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1913
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>It is essential that any plans to deliver infrastructure are clearly set out and monitored to demonstrate progress. This has not been the case previously, despite this point being raised before.</p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all 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. I have particular concerns regarding the impact on 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; indeed these are already been noticed. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030.</p> <p>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.</p> <p>It is not realistic to say that it is the responsibility of the local water authority to provide water to a new development "come what may" and expect them to be able to continue to "magic" water to that site.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1937

<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Have you seen how busy Berkhamsted/Tring/Hemel trains are? The train company is a disgrace with continuous cancellations of services and putting an inadequate number of carriages on, not to mention the cost.</p> <p>We live in the valley in Northchurch and have waste disposal and drainage problems already. Thames Water told us that the main sewage and current pump station are overwhelmed already.</p> <p>We have our Ashridge and green infrastructure already and don't need urban country parks with no character and true nature.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS1963
<b>Person ID</b>	1262618
<b>Full Name</b>	Jasmine 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>Delivering Infrastructure to Support Growth Strategy comment</b>	These are good proposals re infrastructure for needing developer to collaborate re infrastructure and to have it done in a timely way but will it actually happen?? For instance in Markyate they haven't got the additional GP surgery yet but

the housing has been there for at least 5 years and the parking for the housing has also put strain on the car park near the present GP and high street causing difficulties for the present surgery

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS1987

**Person ID** 1262604

**Full Name** Ray Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** 10.7At a local level, necessary infrastructure improvements have not followed from building development in the past. Springfield Road in Berkhamsted was designed to be a relief road which was supposed to link with the B4506, diverting traffic away from Northchurch. This is blocked by Hertfordshire Highways. There are serious problems with the drainage of new development on Shootersway already. This is presumably being left to the developer. This is evidence that infrastructure does not follow automatically from permitted development and that Dacorum has been unable to remedy the situation. Sustainable improvement in infrastructure must come first. There is nothing to give confidence that existing infrastructure needs will be met in this plan, let alone the needs of expansive new housing developments.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS1990

**Person ID** 1262601

**Full Name** Anne Smith

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Cart before the horse?</p> <p>Surely DBC should build an infrastructure plan certainly at the same time as the strategic growth plan if not before?</p> <p>Some of the proposed sites do not have the infrastructure needed and it would seem that these sites have been put forward before any due diligence was completed as future infrastructure needed may be very expensive or not be possible. What may look good on a plan can be very different in reality.</p> <p>Take Lock Field, Northchurch, it is two miles from the station, the B4506 is narrow at this point and there is a single narrow pavement on the opposite side of the road and the sight line poor, there is a bus route but the bus stop is directly on the road with no pavement going north, there is no mains drainage and there is overhead electric supply and there is copper wiring telephony. This community is rural and inappropriate for a 60 house build densely packed on a small site.</p> <p>There is also a point as to whether the infrastructure is ever delivered, the link road promised between Tunnel Fields and New Road, Northchurch was never built. The public need DBC to hold developers to account or delivering infrastructure becomes just a paper exercise.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2013
<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> * Yes * No	Yes

<b>Delivering Infrastructure to Support Growth Strategy comment</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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2053
<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> * Yes * No	No

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2086
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Delivering Infrastructure to support growth. Berkhamsted already has a sewage issue and residents in the Norchurch end of the town currently have toilets backing up due to the sewers not coping with the volume. Congestion at peak times is already horrendous with small journeys taking long times and generating massive pollution. This will be made worse with the proposed massive development. The roads are unsuitable for more cars and cannot be widened due to the fact that historic cottages and houses are in the way and there are already no verges this is replicated for the possibility of introducing cycle lanes. The area is too hilly for constructive cycling as it's exhausting trying to get up the hills which flank either side of Berkhamsted town. The whole town already comes to a halt in the snow as it's so hilly therefore how is it a good idea to build more houses up massive hills where you are unable to get to the town or station. The IDP fails to adequately address these issues (traffic, water and waste water) and is incomplete which reflects the reality that infrastructure always lacks the development which it is meant to serve which is very obvious in Berkhamsted.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2126
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	I have read your plans, or rather bullet points outlining what you would like to do, but I can see nothing concrete here for a local community like Tring. I suspect you are talking about cycle lanes and better/safer footpaths but I can see nothing here that relates to disabled or elderly residents. Will the Grove Rod/Bulbourne Road development (Plan No. 124 on your documents) have shops, doctors, dentists and schools included within it? If not, that will be a long way to walk, especially with a weekly shop and very small children, and, for many, impossible. You might be adding bus services but they will have to be very regular/convenient and, with the longer term results from COVID, people might be reluctant to use bus services. I would expect to understand the answer to all my questions before planning process is completed.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2151
<b>Person ID</b>	399537
<b>Full Name</b>	Mr David Featherstone
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>1 a) The proposed level of development in Dacorum, along with pending development in neighbouring St Albans City and District, Three Rivers District, and in Buckinghamshire east of Aylesbury, would all 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 increase in housing.</p> <p><u>Discussion:</u> 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</p>

and the A41; insufficient cycling lanes throughout the borough; narrow or non-existent pedestrian pavements in many of the built-up areas; insufficient school places (children in some year groups are currently having to be placed outside their locality); insufficient capacity of the local healthcare system with the nearest acute care in Watford, Buckinghamshire or Bedfordshire.

Water supply and wastewater.

a) 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).

Discussion: Paragraph 174 of the NPPF states that plans should promote the conservation, restoration and enhancement of priority habitats, and paragraph 175 states that where significant harm to biodiversity cannot be avoided then planning permission should be refused. The NPPF Glossary states that priority habitats are those habitats included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006 (s 41 sites). Chalk rivers are included in the section 41 list.

The 2010 Water Cycle Study (part of the evidence base for the Strategy, produced for five Hertfordshire LPAs including Dacorum), was based on two growth scenarios presented by the emerging Regional Spatial Strategy. For Dacorum Scenario 1 was 9,000 new homes in the plan period 2006-31, and Scenario 2 was 17,000 new homes (680 dwellings a year for 25 years). The Study concluded that Scenario 1 (across the Study area) would not allow any water surplus past 2030, while Scenario 2 would require additional imports of water from 2024 during critical periods.

- 1 b) The proposed increase in housing will require substantial investment in infrastructure in order to transport and treat wastewater and sewage. The proposed plan makes no mention of how improvements in wastewater and sewerage infrastructure will be funded and the time period for their completion.

Discussion: The Adopted Core Strategy 2006-2031 for Dacorum Borough states that 'developers should ensure that there is sufficient capacity at the relevant wastewater treatment works. It also states: 'The most pressing (infrastructure) issue is that of sewage treatment infrastructure, which will need significant upgrades to serve the development proposed in the wider area, including that in Dacorum.' The current proposals make no mention of the specific need for sewerage infrastructure improvements (para 10.4 on page 49), although Policy SP7 sets out the mechanism for delivering infrastructure which places responsibility for funding with developers. Policy DM35 (on page 126) states that development which would cause a significant increase in water pollution (among other effects) will not be permitted. The 2010 Water Cycle Study sets out a long list of wastewater treatment and sewerage issues across the five Local Planning Authority areas which needed to be addressed to accommodate the growth levels proposed at the time. It states (on page 4): 'a number of potential growth locations are located to the opposite side of existing settlements with regards to the Waste water Treatment Works (WwTW) or trunk sewers. Any network upgrades required through the existing settlement will be expensive and disruptive, and may therefore be cost prohibitive, particularly if funded by developers.'

The above situation applies to housing proposals on the northern edge of Hemel Hempstead. The town's wastewater currently goes to the Maple Lodge WwTW. The Water Cycle Study states that the Maple Lodge WwTW (or Blackbirds WwTW, dependant on TWU strategy) will require substantial upgrades under both growth Scenarios. Limited space at Maple Lodge WwTW may make this problematic. Higher wastewater flows also have potential impacts on water quality, including downstream of WwTWs, including during storm events which are expected to increase in severity due to climate change. Such upgrades would be disruptive, expensive and require three to five years to plan, design and construct. It is not explained in the current Dacorum documents whether any of these issues have already been addressed by infrastructure improvements.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS2194

**Person ID** 1262765

**Full Name** Paul Rees

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Delivering Infrastructure to Support Growth Strategy comment** The plan for the infrastructure required in Dacorum should be hugely amended in order to move far more traffic off roads and onto cycle paths, aided by greater use of public transport. Humanity is facing a climate and ecological crisis. Therefore, we cannot continue with business as usual, and the kneejerk assumption that we need more and more roads. Cycle paths not only cause far less damage to the natural habitat but they encourage people to get outside and make journeys that are good for their physical and mental health.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS2202

**Person ID** 1262841

**Full Name** 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>Delivering Infrastructure to Support Growth Strategy comment</b>	The IDP doesn't address issues, including traffic, water and wastewater, and hasn't been finished which reflects the reality that infrastructure is always the last thing to be considered and poorly administered.  Living on Granville Road we are all too aware how more traffic and congestion has already effected the safety of our children and an increase in pollution levels. This is before such huge developments have happened.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2222
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The notion that more and more roads should be built, with the obvious increase in the volume of cars and pollution, is old thinking that must be reversed if biodiversity is to be protected and sustainability promoted. Instead of building more roads, Dacorum should be looking to encourage many more people to travel by foot or by bike.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2259

<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> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Local town centre car parks.</p> <p>The car parks in Tring, Berkhamsted and Kings Langley will be totally inadequate for the increases envisaged in the plan.</p> <p>A41.</p> <p>Peak traffic flows can lead to traffic quaues from the M25 junction 20 back to the Hemel Hempstead junction even with current traffic levels. With the additional population increase, this can only deteriorate further with traffic looking for alternative rat-runs. It is equally as bad, possibly even worse, travelling to and from Aylesbury in peak periods.</p> <p>Tring Specific Concerns:</p> <ol style="list-style-type: none"> <li>1. Tring Railway Station - Passenger numbers and train capacity mean that at peak times there is already a struggle for seating. The smalal ticket office, cycle and car parking facilities are currently stretched without the significant increase in passenger numbers that 2500 additional homes will potentially bring, notwithstanding the current tendancy towards home-working.</li> <li>2. Station Road. This road is totally inadequate for the additional traffic at both peak times.</li> <li>3. Icknield Way. Already has queues heading west to the roundabout to join the A41in both directions.</li> <li>4. Brook Street. This is just a nightmare now, especially during school term time.</li> <li>5. High Street. Is constantly in a bad state of repair based on current traffic usage. This will only increase with all the extra vehicles.</li> </ol>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2287

<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The draft IDP is an essential element of the draft Plan. At this stage too much is provisional to assist sound judgement and it gives rise to a number of challenges.</p> <ul style="list-style-type: none"> <li>• The perennial problem of the infrastructure requirement being in place before the employment or residential growth takes place</li> <li>• The basis for developer contributions is unclear pending Central Government's decision on the replacement of Sec 106 and CIL contributions with a single national development value related scheme</li> <li>• The shortfall in current infrastructure needs in towns such as Berkhamsted let alone that driven by future growth</li> <li>• In Berkhamsted some infrastructure requirement, such as a secondary school is purely driven by the excessive residential growth proposed</li> <li>• Small scale sites are fragmented and time variable which will reduce the impact they make on infrastructure requirements</li> <li>• Promoting movements by means other than car may be a commonly held aspiration, but lack reality when applied to Berkhamsted</li> <li>• Healthcare. Acute care is provided to the Region by WHHT and is not the responsibility of DBC but current provision is old and inadequate. DBC should be pushing for a new Hospital to serve the Region's growth needs.</li> </ul> <p>Overall, the draft IDP demonstrates how impractical it is to force significant growth on to settlements such as Berkhamsted which in many respects is at capacity now.</p> <p>Too much of the required infrastructure is either impossible to achieve, such as road widening, or requires significant investment by third parties. For example, sewage and wastewater treatment and network at capacity, as acknowledged in paragraph 15.65 of the IDP. The solution offered is simply that Thames Water and the developer will deliver without any evidence that the infrastructure can actually be delivered.</p> <p>Potable water supplies rely on extraction from aquifers. Affinity Water have had to agree to extraction limits with the Environment Agency and major investment is required to support new sources of water.</p>

BRAG has raised these issues in past consultations and again expand on this in section 17 (Climate Change and Sustainability). DBC's answer is that *“developers have a right to connect and development cannot normally be resisted on the grounds of inadequate water supply or sewerage capacity.”*

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

In short, the draft IDP fails to adequately address these issues.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2321
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	All sounds very sensible but unfortunately is not translated through into the sites plans in many cases .
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2375
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The infrastructure delivery plan should have been made available at the same time as the Local Plan, otherwise this is all just a "prayer on paper". There is not point in plonking houses and businesses down on the map before knowing whether it is feasible (and legal) to provide the support infrastructure in terms of road links, public transport, sewage, schools etc etc.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2393
<b>Person ID</b>	1263023
<b>Full Name</b>	Sean McKay
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I am concerned that the plan for house building in Berkhamsted will leave the current infrastructure over stretched, leading to serious issues. In terms of the current schemes, those houses will significantly increase traffic leaving Berkhamsted to head south. Currently, there is on;ly one way to do that, avoiding the High Street, so unless this changes, an already problematic junction at the top of Kings Road, will become completely unviable at rush hour.</p> <p>Secondly, there appears to be absolutely no provision for extra sports facilities, despite a large increase in the number of Berkhamsted residents. Not only will no new facilities be provided but with the in-filling, current space for sport will actually be removed.</p> <p>With the latest developments at Bearroc Park, provision was made for associated sports facilities but 3 years on, these still remain inaccessible to local sports clubs. With the nation's obesity crisis in mind, this is simply unacceptable and the Council must be responsible for ensuring that the town's children can easily access spaces where they can exercise.</p>

The Bulbourne Cross development appears to provide plenty of sports facilities but, can we be sure, given previous developments, that they will actually deliver what they promise?

I have no objection to the building of new homes, clearly there is a need. However, consideration must be given to the needs of current and future residents beyond the bricks and mortar of their homes. Access and especially sport facilities are key to making these larger towns function as successful places to live. We have an opportunity to provide essential housing, while enhancing Dacorum towns but this requires a more complex and considered solution than the one that I currently see in place.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS2398

**Person ID** 1262981

**Full Name** Chris Mabley

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** Cycle paths and footpaths need to link up beyond immediate neighbourhoods to be successful eg the proposed cycle tracks for Berkhamsted and Hemel Hempstead need to join up through Bourne End instead of being considered in isolation from each other. Safety in rural lanes needs to factor in higher priority for non vehicle use perhaps by limiting access on the basis of axle weight or size, cutting speeds and quiet ways designation. Housing developments must assess their impact on the wider road network: even if a number of dwellings will be assumed not to be car based for work, food will be delivered etc. Infrastructure for population increase is predicated on developer contributions which are not made until some of the additional population is in situ. This model is unsustainable and impacts unfairly on the population already in place eg years of overcrowded schools with children in portacabins while critical mass builds for a new school.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS2411

<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>Delivering Infrastructure to Support Growth Strategy comment</b>	It seems odd to me that you are asking people to comment on the delivery plans when the infrastructure strategy has not been completed yet. How can we comment on traffic flows created by 5,000 extra homes when the studies into the effects have yet to be published. How can ask for <b>CIL</b> to be spent on Water End bridge bypass if the facts are not there to support any claims for or against
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2454
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Increasing the number of homes built in Bovingdon must not be used as an argument for improving the infrastructure. The existing infrastructure in Bovindgon is already struggling to cope and is of major concern to residents of the village. It is very difficult to drive through Bovingdon due to the amount of traffic going through and lack of parking. Green Lane is an extremely busy road and is becoming more of a single lane road towards the High Street, with more cars having to park outside their houses. It is very dangerous for cars exiting Homefield in particular due to sighting problems.

Chesham Road is also extremely busy with the Market, filming on the airfield, Dancing on Ice etc.  
For 240 houses to be built there will be insufficient healthcare, social care provision.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS2506

**Person ID** 1263101

**Full Name** Richard Hall

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** Surely some infrastructure can be delivered ahead of schedule to improve the quality of services for existing residents. This will attract further new residents and create a draw.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS2530

**Person ID** 222269

**Full Name** Georgina Tregoning

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

<b>* No</b>	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I am concerned that, if the plan goes forward as proposed, the provision of water for the increased population will be unsustainable.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2545
<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> <b>* Yes</b> <b>* No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	This is not properly addressed. With such a massive proposed increase in dwellings it is a huge failure not to adequately look at the infrastructure requirements at the SAME time not when its too late.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2555
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	This section does not address the infrastructure challenges that will come from building so many new houses, particularly for a town by Berkhamsted, which already has such obvious traffic problems.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2561
<b>Person ID</b>	1261636
<b>Full Name</b>	James Lane
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Your plans to improve J8 of the M1 would not help in any way to the planned development of North Hemel. If improvements are not made to help access to J9 of the M1. The B487 is already congested and not fit if capacity goes up due to development as the main route to the M1. You have not given any thought as to how people will use the roads once the houses are built. This will impact the quality of life, making it worse for people already living in North Hemel and the local areas.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2573
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	As previously commented on a circa 25% population increase needs to be catered for in terms of infrastructure - shops, traffic flow, facilities, work/employment, recreation opportunities none of this is adequately covered in the plan
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2596
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>A414 strategy, Mass Rapid Transit and Transport Proposals</b></p> <p>The Plan (21.15) states that</p> <p>“....priority will need to shift away from car-based transport towards a lower carbon future for movement .... The policy will therefore give greater emphasis on the provision of bus, cycle and pedestrian transport infrastructure through its enhancement, extension or addition of as appropriate;”</p> <p>and (21.16) quotes the NPPF which states that</p> <p>“sustainable transport options will vary between urban and rural areas.”</p> <p>and in 21.34 states that</p> <p>“Passenger transport is also important for social inclusion as it offers access to travel to those ... living in more rural parts of the Borough. However, the Council acknowledges that both services and the supporting infrastructure need to be improved to ensure greater uptake and to remove barriers to the most vulnerable.”</p>

The only detailed transport proposals included in the plan are the development of a Mass Transit System to connect Hemel Hempstead with Harlow using some of the A414 route (21.11), the need for a new northern corridor to serve Hemel Hempstead (21.17) and road junction improvements in Hemel, Berkhamsted and Tring (21.7). Otherwise 21.18 states that

“the exact transport interventions and the timing of delivery will be detailed in the next stage of the Plan.”

We fully endorse the need for more passenger transport, especially for rural areas, but in the absence of any detail of what is proposed, we cannot support the Plan.

With regard to the new Northern corridor, the Transport Topic Paper (p38 - 39) refers to an analysis undertaken using the COMET model developed by HCC to analyse the impact of the Plan on transport.

“The model indicates that the A414 broadly operates within capacity with reduced flows through central Hemel Hempstead, due to a direct access being modelled from M1 junction 8 into eastern Hemel, the modelling of the new link road within the North Hemel Garden Community and the reduction of the A414 to one lane for general traffic in each direction in order to allow for improved public transport and active travel connections.” (6.11)

“It should be noted that in this model scenario the new link road allows an unrestricted connection from Leighton Buzzard Road to Redbourn Road and down to the A414 and M1. The final routeing and form of this link, known as the Northern Link Route, is yet to be finalised” (6.12)

“The new link road modelled in North Hemel Hempstead is predicted to be used by traffic from Tring and Berkhamsted accessing the M1 rather than travelling ‘through Hemel Hempstead’ via the A414/A41>” (6.13)

We understand this to mean that as a result of the intention to restrict the width of the A414 through Hemel Hempstead to accommodate the proposed MRT system to Harlow and other public transport initiatives, that the plan is to re-route some of the through-traffic coming from the north that would otherwise use the A414 to the new link road in North Hemel Hempstead.

How is traffic from Tring and Berkhamsted supposed to access this new link road?

- 1 we see no suggestion of any improvements to existing roads or that there will be a new link between the A41 and Leighton Buzzard Rd.
- 2 to the north along the Leighton Buzzard Rd is the single-lane, weight restricted, bridge at Water End, already the site of frequent accidents and significant congestion at peak times.
- 3 the most direct route is from Berkhamsted in the west. This passes through the already highly congested crossroads in the centre of Berkhamsted, then via one of three single lane crossings of the railway, also the sites of frequent accidents, through the middle of Potten End before descending into Water End.
- 4 or traffic is expected to go south down the A41 to the A4146 junction, north up the A4146, east across the north of Hemel Hempstead and south to J8, a significantly longer journey than (3) above.

We understand from conversations with Officers that a Paramics Microsimulation will be commissioned to model the detailed impact on traffic flows as a result of the proposed developments. As this goes to the heart of the viability, let alone sustainability, of the Hemel Garden Communities proposal we don't understand why this wasn't commissioned

sooner to form part of the evidence base and would be surprised if the outcome didn't indicate a significant increase in traffic through Water End.

In the absence of any detail of the transport interventions, it appears that Hemel Hempstead's traffic problems are to be exported to Water End, Potten End and Berkhamsted. There is no point protecting small villages from development, only to route increased traffic flows through them. This is both unacceptable and completely impractical.

We urge the Council to include a policy to protect small villages and hamlets from increased traffic flows as a result of the new housing development.

### Digital connectivity

We support the Council's commitment to the introduction of new technology but the Council's Policy DM57 (Digital Communications) focuses solely on the delivery of Fibre To The Premises (FTTP) to new developments. What are the Council's plans to improve the connectivity of rural areas that will not have new housing developments?

### Healthy Communities

We appreciate that the decision regarding a new hospital lies outside the control of the Council, but it does seem incongruous that the Plan includes proposals for a new crematorium (SP11.2.d) but not for a new hospital.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2722
<b>Person ID</b>	1263254
<b>Full Name</b>	Teresa Finnigan
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	There will not be enough appropriate structure put in place as you are not building the houses in the right places near to the current infrastructure eg the train station, more housing should be built around this area for people to walk to the train station and the town centre, you talk a lot about sustainability, the environment, well that won't be the case if you have lots of traffic from the other side of Hemel hurtling to the train station each morning, all infrastructure should be within a 10min walk to houses.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2768
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I do not believe this plan is realistic in its ambition to reduce reliance on cars in market towns and will therefore significantly increase the congestion.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2790
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	In principal this appears reasonable, although I recommend that emphasis should be placed on avoiding damage to environmental assets rather than mitigation. This should be reinforced by through more Hedge Retention and Tree

Preservation Orders issued by Planning. These Orders should include 10m and 15m buffer zones respectively to support root and canopy growth, where there is no invasive development or damaging footfall.

An urgent and co-ordinated local authority strategy to ensure adequate water and water levels in the chalk streams is a priority. This could include extension of Tring Reservoirs, which will also support the Wildlife sites and tourist potential. This should be linked to a mains sewage removal strategy as many peripheral sites rely on septic tanks.

Universal access to superfast broadband and the development of sites for conservation and biodiversity that are allocated Value 2 status by Herts Ecological Network Dataset should be priority considerations for support for developer contributions.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2856
<b>Person ID</b>	1012318
<b>Full Name</b>	Mrs Jane Hennell
<b>Organisation Details</b>	Area Planner Canal and River Trust
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The Grand Union Canal & Rivers are valuable part of the strategic and local Green Infrastructure network. They also provide an important wildlife route and act as stepping stones for mitigation against habitat loss, dispersal and the genetic exchange of plants. We are pleased to note that GI is recognised in this strategic policy, however the Council should consider making it clearer that green infrastructure also includes water, or blue space. This can be achieved by amending to 'multi-functional green and blue spaces' and amending the glossary accordingly.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2859
<b>Person ID</b>	1260880
<b>Full Name</b>	Keith 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>1. The provisions for local transport within Berkhamsted to sustain the various new developments there appear inadequate. Local travel to and from the town centre generally and the A4251 in particular will add a heavy load to existing narrow roads and there is no provision for new roads. Adding ICE-powered vehicle traffic volume to these roads will increase already-high pollution in the medium term as it is unrealistic to expect more people to walk or cycle bearing in mind steep hills and the risks of the higher traffic flow itself.</p> <p>2. Similarly, local traffic parallel to the High Street, especially to take children to and from school daily will increase and pollution, and narrow roads and pavements will discourage walking or cycling.</p> <p>3. It appears that the impact of upgrading Berkhamsted's existing housing and commercial buildings and streets to respond to climate change has not been factored into the plan, as the two will need to be carried out simultaneously. Much of the town is a conservation area, and the old buildings will need major works to meet future energy efficiency needs - effectively lots of major refurbishments in every narrow street for many years. Residents rely on street parking through much of the town. Electrification of cars will entail a huge roll-out of charging points through these narrow streets. These factors will surely add seriously to the difficulty both of implementing the Local Plan and of moving around the town as the number of residents increase.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2872
<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

**Agent Organisation**

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

Yes

**Delivering Infrastructure to Support Growth Strategy comment****A414 strategy, Mass Rapid Transit and Transport Proposals**

The Plan (21.15) states that

“...priority will need to shift away from car-based transport towards a lower carbon future for movement .... The policy will therefore give greater emphasis on the provision of bus, cycle and pedestrian transport infrastructure through its enhancement, extension or addition of as appropriate;”

and (21.16) quotes the NPPF which states that

“sustainable transport options will vary between urban and rural areas.”

and in 21.34 states that

“Passenger transport is also important for social inclusion as it offers access to travel to those ... living in more rural parts of the Borough. However, the Council acknowledges that both services and the supporting infrastructure need to be improved to ensure greater uptake and to remove barriers to the most vulnerable”.

The only detailed transport proposals included in the plan are the development of a Mass Transit System to connect Hemel with Harlow using some of the A414 route (21.11), the need for a new northern corridor to serve Hemel Hempstead (21.17) and road junction improvements in Hemel, Berkhamsted and Tring (21.7). Otherwise 21.18 states that

“the exact transport interventions and the timing of delivery will be detailed in the next stage of the Plan”

We fully endorse the need for more passenger transport, especially for rural areas, but in the absence of any detail of what is proposed, we cannot support the Plan.

With regard to the new Northern corridor, the Transport Topic Paper (p38 - 39) refers to an analysis undertaken using the COMET model developed by HCC to analyse the impact of the Plan on transport.

“The model indicates that the A414 broadly operates within capacity with reduced flows through central Hemel Hempstead, due to a direct access being modelled from M1 junction 8 into eastern Hemel, the modelling of the new link road within the North Hemel Garden Community and the reduction of the A414 to one lane for general traffic in each direction in order to allow for improved public transport and active travel connections” (6.11).

“It should be noted that in this model scenario the new link road allows an unrestricted connection from Leighton Buzzard Road to Redbourn Road and down to the A414 and M1. The final routing and form of this link, known as the Northern Link Route, is yet to be finalised” (6.12).

“The new link road modelled in North Hemel is predicted to be used by traffic from Tring and Berkhamsted accessing the M1 rather than travelling ‘through Hemel’ via the A414/A41 (6.13)”.

We understand this to mean that as a result of the intention to restrict the width of the A414 through Hemel Hempstead to resolve the problem caused by the current A414 splitting the town for non-motorised traffic and to accommodate the proposed MRT system to Harlow and other public transport initiatives, that the plan is to re-route some of the through-traffic coming from the north that would otherwise use the A414 to the new link road in North Hemel Hempstead.

How is traffic from Tring and Berkhamsted supposed to access this new link road?

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- 3 the most direct route is from Berkhamsted in the west. This passes through the already highly congested crossroads in the centre of Berkhamsted, then via one of three single lane crossings of the railway, also the sites of frequent accidents, through the middle of Potten End before descending into Water End.
- 4 or traffic is expected to go south down the A41 to the A4146 junction, north up the A4146, east across the north of Hemel Hempstead and south to J8, a significantly longer journey than (3) above.

Informally we have been advised by Officers that the expectation would be for traffic to use the A41 to the A4146 junction, pass north up the A4146 to the west of Hemel to the new link road, across the north of Hemel and then south to J8 a journey of 18km rather than the 12km direct route through Potten End (see the attached map). Irrespective of the pinch points in Berkhamsted we are concerned that this will lead to increased traffic through Potten End.

We understand from conversations with Officers that a Paramics Microsimulation will be commissioned to model the detailed impact on traffic flows as a result of the proposed developments but as this goes to the heart of the viability, let alone sustainability, of the Hemel Garden Communities proposal we don't understand why this wasn't commissioned sooner to form part of the evidence base and would be surprised if the outcome didn't indicate a significant increase in traffic through Potten End.

In the absence of any detail of the transport interventions, it appears that Hemel's traffic problems are to be exported to Great Gaddesden, Potten End and Berkhamsted. There is no point protecting small villages from development, only to route increased traffic flows through them. This is both unacceptable and completely impractical.

There needs to be a policy commitment to protect smaller villages from increased traffic flows.

### **Digital connectivity**

We support the Council's commitment to the introduction of new technology but the Council's Policy DM57 (Digital Communications) focuses solely on the delivery of FTTP to new developments. What are the Council's plans to improve the connectivity of rural areas that will not have new developments?

### **Healthy Communities**

We appreciate that the decision regarding a new hospital lies outside the control of the Council, but it does seem incongruous that the Plan includes proposals for a new crematorium (SP11.2.d) but not for a new hospital.

<b>Included files</b>	<a href="#">Possible traffic flow map.png (3)</a>
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2905
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Berkhamsted' infrastructure does not support so many homes being built. I think this will be the same for Tring too whereas, there is scope in Hemel Hempstead with its large retail outlets, high street (which has recently been regenerated and could be further) to increase the volume of homes without affecting other areas.</p> <p>Berkhamsted's location at the bottom of a steep sided chalk valley, a historic part of the Chilterns with chalk streams, is not in the best shape to encourage more development.</p> <p>- It will be difficult to increase access into the town. The town's roads, outside of pandemic, are extremely busy especially in the mornings and evenings with regular queues down the high street and tailing back over the A41 from the A416. The strategy will excaerbate traffic issues at the top of the valley.</p> <p>In recent times, the traffic on Shootersway has doubled with regular queues. This has increased substantially since the new houses on Durrants Lane (with more coming). This document proposes 800 more homes along this stretch of road (which is essentially is a wide residential/country lane. It simply isn't sustainable and I would object to any of the current trees being cut down for road widening. Having such a huge volume of traffic at this south side of town with only access being by the rather hairy Shootersway/Kings Road junction feels like it is putting undue pressure on the area. In addition, the access up to this road is from country lanes, narrow lanes like Darrs Lane and roads through housing estates (Durrants Lane) which do not seem practical.</p> <p>There has been no amenities added to South Berkhamsted from the Durrants Lane development and no sign of any community facilities either.</p> <p>I am not convinced Berkhamsted's water supply will be able to cope with the demands on it and new systems will have to be built at great disruption to current residents.</p>

Our doctors' surgeries seem to be merging but even they will not cope with upward of another 8,000 patients when it already takes a long time to get an appointment. Where is the provision for more medical care and improved sports facilities for all? we need a better recreational centre as, post pandemic, more people are outside and exploring their local areas.

We don't have huge public spaces for community use and we shouldn't be getting rid of green belt land where people are enjoying walking to replace with housing.

It is difficult to get into town from Shootersway/South Berkhamsted unless in a car and we would argue we need better cycle paths in this area if any roads are to be built.

In addition, 2,000 new homes will put pressure on our already busy secondary school and there seems to be no allocation for other schools - where even would it go - if too many houses are to be built.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS2924

**Person ID** 1263377

**Full Name** Jane Messenger

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** No

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS2952

**Person ID** 1263445

<b>Full Name</b>	Andrew Farrow
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	With the chalk aquifer already described as “over-abstracted” and local residents only too aware of the fragility of their water supply, the level of new housing proposed will put severe strains both on supply and disposal. With a significant time-lag in the availability of new water supplies we are concerned that the new developments will increase calls on the aquifer, potentially leading to significant inconvenience for residents but more importantly risking damage to the Borough’s precious chalk streams. Dacorum and Affinity Water have recently spent time and money on improving the River Gade, only for this Plan to put that improvement at risk.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS2953
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The Plan is vague on how infrastructure would be delivered, ignores that water extraction from aquifers is already at limit, has no plans to deal with waste water/sewage disposal which already seems to be at capacity in Berhamsted and doesn't address how increased traffic in Berkhamsted would be managed.
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3035
<b>Person ID</b>	1263491
<b>Full Name</b>	Peter 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>Delivering Infrastructure to Support Growth Strategy comment</b>	There is nothing mentioned in the plan about schools or health facilities. Increasing the housing stock increases the demand for both of these.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3041
<b>Person ID</b>	1146084
<b>Full Name</b>	Mr Jason 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>Delivering Infrastructure to Support Growth Strategy comment</b>	Water supply and waste water disposal The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 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** Delivering the Infrastructure to Support Growth

**ID** EGS3045

**Person ID** 1261425

**Full Name** Camilla Pascucci

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

1 The Dacorum DLP does little to address improvements in the infrastructure services and facilities in Dacorum required to support the proposed increase in

We live on Northchurch Common and have continuous problems with water pressure which drops so low and even stops during the summer months. The level of new housing proposed is expected, under drought conditions, to put severe strain on water supplies to Dacorum during the 2020s.

The growth proposed by the DLP would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This could take years to complete and be extremely expensive as well as disruptive to the affected communities.

**Included files**

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3102
<b>Person ID</b>	1263510
<b>Full Name</b>	CAROL HAYES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>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.</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3130
<b>Person ID</b>	1263457
<b>Full Name</b>	Matthew Deane
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The infrastructure in Tring is not fit for purpose for the today , let alone the future. The station is already heavily used and it is highly likely that a large number of new inhabitants will be attracted by the station and access to London. The bus service is expensive and not much use out of limited hours. Cycle paths are limited and of poor quality. The plan lacks any concrete commitments to address any of these and while big on aspiration, the evidence is that any improvements , however, desireable are unlikely to be delivered. I have already contacted the local council regarding their vision for supporting a move to electric vehicle charging and have been told that there are no plans. This is not consistent with a plan to promote more sustainable transport or address the Climate emergency. Overall the lack of commitment to this will have a huge negative impact on quality of life , and is currently inconsistent with the aims of the Vision.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3219
<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> * <b>Yes</b> * <b>No</b>	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3262
<b>Person ID</b>	1145069
<b>Full Name</b>	LYNN 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>4 Impact on infrastructure. The proposed plan does little to address the improvements in infrastructure necessary to support the increase in housing. It ignores issues such as traffic congestion, and provision of education and healthcare.</p> <p>5 Water supply and waste water. The amount of extra 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. That 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. The proposed plan also makes no mention of how improvements in waste water 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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3268
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The infrastructure delivery plan does not address the issues around water and traffic in a satisfactory way. The council have declared a 'climate emergency' yet are happy to continue to put onerous pressure on our rare chalk streams (it is likely that these will be brought to destruction by further extraction). Again, the topography of Berkhamsted means that traffic cannot be adequately addressed. Even the building of on Jewson and the retail/housing next to Turner Court will put further pressure on the ever growing rat run along Bridgewater Road and Billet Lane as people avoid the horrendously congested High Street. Further evidence that this Growth Strategy doesn't support the current or future townspeople of Berkhamsted.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3339
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).</p> <p>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.</p> <p>During the lockdown's of the COVID 19 pandemic the need and use of footpaths for the communities physical and mental wellbeing was highlighted. The maintenance and expansion of footpaths and bridleways is needed to be included.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3344
<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 * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The trouble with this policy I'm unconvinced that monies given to the Council will be used to improve the infrastructure following development.</p> <p>I suggest that these monies are put into a restricted account to be used <u>solely</u> for the infrastured purpose purpose stated in the Local Plan.</p> <p>Infrastructure development should precede development, ideally and where possible. It seems like there is a 'suck it and see' attitude in the hope that the anticipated problems don't develop. I remain disappointed with the Council that suggested necessary improvements to footpathes to improve the safety of pedestrians (mainly teenager going to and from school) never happen following the development of Bearoc Park.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3363
<b>Person ID</b>	1263693
<b>Full Name</b>	Ruth Colderwood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3399
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Current facilities undersupply and increased future demand:</b> 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 &amp; 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.</p> <p>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.</p> <p>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.</p> <p>DSN believe that a key consideration for the new local plan should be the allocation of potential sites for new sporting facilities – especially sporting hubs (see below). 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.</p> <p><b>Special attention to local needs as well as Borough wide provision:</b> As well as taking an holistic view of sporting facility development across the Borough, it is clear that specific plans are needed for the individual communities most</p>

affected by increased housing numbers, e.g. Tring, Berkhamsted and local areas within Hemel - including the major new development areas such as Hemel Garden Communities.

As clearly evidenced by DBC data on file, the towns of Tring and Berkhamsted are already experiencing major shortages of playing pitch space and lack of room for expansion of existing clubs and sporting facilities. So significant coordinated plans are needed for increasing the playing spaces within both these towns which will be experiencing the highest percentage of population increases. This needs to be considered as part of the housing sites selection process.

**Delivering the Council's own stated vision for sport:** DBC's own Playing Pitch Strategy clearly defines the councils' vision for Sport and Leisure in the Borough.

*'Our vision is for Dacorum to be a leader in the promotion of health and wellbeing with physical activity being a key driver in creating healthier, more active communities.'*

*"...the best way to ensure sporting provision is by supporting our local clubs and teams, aiding them in delivering a high-quality experience to their members."*

*"Below is Dacorum's vision for its sport and leisure provision for the period 2019 - 2036.*

*To achieve this vision, the strategy seeks to deliver the following objectives:*

- Working collectively with partners to create opportunity for everyone to participate*
- Ensure that there are enough facilities in the right place to meet current and projected future demand.*
- Ensure that all clubs have access to facilities of appropriate quality to meet current needs and longer-term aspirations."*

This Local Plan and the associated Infrastructure Plan needs a more concerted focus on sport and leisure if the Council is truly committed to achieving the stated objectives in its PPS; as follows:

***"OBJECTIVE 1: To protect the existing supply of outdoor sports facilities where it is needed to meet current and future needs.***

***"OBJECTIVE 2: To enhance outdoor sports provision and ancillary facilities through improving quality and management of sites.***

*... to include priority projects from within the PPS Action Plan for inclusion within its Infrastructure Delivery Plan ...ensuring that CIL receipts are identified towards appropriate projects for sport....A number of planning policy objectives could be implemented to enable the above to be delivered... [Section 106/CIL] Contributions should also be secured towards the first ten years of maintenance on new pitches ...Where new multiple pitches are provided, appropriate changing rooms and associated car parking should be located on site ...all new or improved outdoor sports facilities on school sites should be subject to community use agreements."*

***"OBJECTIVE 3: To provide new outdoor sports facilities where feasible and there is current or future demand to do so.***

- Identify opportunities to add to the overall stock to accommodate both current and future demand.*
- Rectify quantitative shortfalls through the current stock."*

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3416
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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 The draft IDP demonstrates how impractical it is to force significant growth on to settlements such as Berkhamsted which in many respects is at capacity now.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3471
<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

**Delivering Infrastructure to Support Growth Strategy comment**

10.3 The term infrastructure covers a wide variety of services and facilities provided by private and public bodies and includes:

*transport infrastructure (rail, roads, cycle routes, buses, footpaths/pedestrian links);*

**Transport**

As previously stated, the Sustainable Transport study, is a nonsense when it comes to Berkhamsted because it:

Fails to address the issues resulting from the topology of the town

Has failed to understand the primary routes through the town

Chesham Road a narrow one way road is suggested as a main access road to the town centre, from the Shootersway developments

Shootersway a major route from the West to the town centre/ station and A41 – is classed as a residential road serving country lanes and Champneys.

Durrants Lane again a main route from W Berkhamsted/Northchurch to the A41 is classed as a Country Lane

Contains No proposals for mitigation measures on the narrow partially one way Country Lane -Darrs Lane abutting BK06

Contains No proposals to protect the ancient sunken way Bell Lane also abutting BK06

Proposes untenable interventions on New Road Northchurch

Fails to address the congestion issues and consequential rat running ( I would mention Shootersway Lane a small private road which is a primary rat run, particularly in the rush hour for traffic from West Ward to access the A41 and local schools – not mentioned, presumably because it is a private Road)

I understand it was a desk top study, backed up by a town visit in August 2020 when schools were on holiday – schools traffic being a primary contributor to rush hour congestion?

• *utilities and flood management infrastructure – water supply and treatment, flood prevention and drainage, waste disposal and energy;*

I refer you to Q 26 Evidence base, and the 2010 Water Study which identified issues based on lower numbers than now proposed

• *community infrastructure – schools, sport, cultural and recreation facilities, healthcare,*

**Education**

I welcome the proposal for a new secondary school in the West of Berkhamsted, the projected one class shortfall at Ashlyns, even without the proposed developments is a significant issue for children in West Ward and Northchurch, who will be the ones potentially unable to attend school in their own town, due to catchment area constraints.

Primary schools are chicken and egg 1fe per 500 dwellings.

**Health**

The plan acknowledges that the GP provision in Berkhamsted is already an issue, but assumes the relocated surgery at Gossoms End will be able to cope with the growth together with a small extension to the Manor Street Surgery. I am unconvinced.

There are no proposals for additional Primary Care Care provision listed in the IDP. The assumption that all growth (I understand, 1 additional GP each 1000 dwellings) can be accommodated at Gossoms end, takes no account of the limited parking which for the most part is occupied by staff.

### **Culture**

The plan proposes no additional cultural facilities throughout the Borough - see Q8 - leisure

### **Sport**

Additional sports facilities are proposed in the IDP for Berkhamsted paid for by developers - I understand these are just a formula based aspiration and indeed no site for them has yet been identified.

• *public transport, emergency services, social care facilities, community buildings, places of worship and associated facilities, and community recycling facilities;*

### **Public Transport**

There is no intra town public transport in Berkhamsted, and it's doubtful if such a service would be viable, but lack of public transport options, reinforces the unsustainability of the chosen development sites in Berkhamsted.

• **Green Infrastructure including multi-functional green spaces, ecological enhancements, open green spaces (e.g.parks, allotments, and country parks).**

The minimal open spaces, wild life parks and areas, proposed for sites in Berkhamsted, are in general the size of a large garden,(though again I understand nor reliance can be placed on these figures as they are just aspirational formula based estimates) and whilst better than nothing, can in no way make up for the ecological damage, nor the loss in health benefits to the existing community, in developing Greenbelt sites close to the population centre. Suggesting that sites will add to bio diversity is a box ticking exercise.

A aspirational park is proposed on BK06. Berkhamsted has no parks in the true sense of the word, so a real park - flowers, trees, water features, seating would be welcomed.

## **Included files**

<b>Title</b>	Delivering the Infrastructure to Support Growth
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<b>ID</b>	EGS3502
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<b>Person ID</b>	1263810
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<b>Full Name</b>	David Tolfree
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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>	
<b>Yes / No</b> * Yes * No	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3545
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3573
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	In my view off-site infrastructure improvements rarely cover the real needs. There is a danger that 16,000 homes are built and the existing roads are expected to cope. So many roads in Dacorum have become overloaded that infrastructure improvements should be made now to accommodate current and future needs not wait for the roads to come to a complete halt. Our chalk streams are under great pressure now, can we build the reservoirs now to support the current population and business use rather than wait until the ground water has disappeared for good!
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3599
<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	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3677
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Local water utilities already dump raw sewage into our rivers when their systems can not cope. Adding more housing (even if water utilities receive investment) will only make this situation worse.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3701
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Outdated, houses not needed and destroying the green belt is not the right way to do it
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3720
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3736
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	I can't see that there is any new infrastructure planned. No new GP surgeries, new school, safe cycle ways. No improvements to roads or traffic flow. No improvements on water supply or waste water disposal. No proposals to improve walking , cycling , public transport routes around the town. The transport study takes no account of Berkhamsted's geography and valley setting. Most building is proposed along top of valley. All additional traffic created would feed onto Shootersway, and New road; both narrow roads.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3803

<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Town centres need to be redeveloped as residential centres - this strategy does not address this.
<b>Included files</b>	
<hr/>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3830
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	An identified key target from the HIFP is to introduce alternative to cars as means of transport. The scale of the planned housing developments in Berkhamsted, along with the topography of the town (which is also identified as a problem in the documentation) make such suggestions (and therefore SP7 unrealisable to any meaningful extent. The Lock Field development is a significant case in point, being at a pinch point relating to the A4251, the local school, the canal and rail bridges and access to Ashridge.
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3858
<b>Person ID</b>	1263982
<b>Full Name</b>	Lisa York
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The infrastructure cannot cope as it is!!
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3892
<b>Person ID</b>	1263998
<b>Full Name</b>	Mrs Lara Dixon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Water as a resource and waste disposal : Further development will put severe strain on water supplies in this area. With climate change happening at a rapid rate, drought will become a predictable consequence in future years.

Consequently, natural aquifers in the area may need to be tapped to keep up with the increased demand for water and this will have a devastating impact on the natural chalk streams in the area. These are unique and rare aquatic habitats that cannot be sacrificed.

Waste disposal

My mum lives in the village of Borough Green in Kent. In the last few years there has been a number of housing developments built in and round the village. The sewers and pumping system could not cope, leading to a number of houses, including my mother's, being flooded by run off combined with sewage on several occasions. This has taken more than 2 years to be rectified. How can we be assured that the same will not happen in Berkhamsted? I have not seen any proposals for improved and enhanced water/ waste infrastructure in the plans.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3933
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS3966
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Delivering infrastructure, whilst key, should not be at the expense of maintaining and improving current infrastructure. The policy should commit to equal efforts and funding to maintenance as it does to improvement. For example, road re-surfacing, repairing the potted Tring high street properly, improving parking provisions and flexibility.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4066
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>New Gospel Hall Trust welcome the recognition at paragraph 10.3 that the term infrastructure covers a wide variety of services and facilities. In particular, the Trust welcomes and supports the inclusion of places of worship in the category of 'community infrastructure'.</p> <p>Policy SP7 is supported in principle, but noble as this is in concept, experience in other districts has highlighted the difficulty in providing more specialist community infrastructure such as places of worship through developer provision. In practice, it is difficult and impractical to demonstrate any strong direct linkage between new housing development and provision for a new place of worship for a particular faith group as distinct from any proposed ecumenical facility, which is wholly unacceptable to the Trust who hold their gospel halls as appointed meeting places dedicated for the worship of God and for religious instruction including gospel preaching. For these reasons, such proposals will not meet the tests set out at Framework paragraph 56 for the use of planning obligations; namely:</p>

- 1 Necessary to make the development acceptable in planning terms;
- 2 Directly related to the development; and
- 3 Fairly and reasonably related in scale and kind to the development.

For these reasons it is submitted that Policy SP7 will be ineffective in provision of delivery of infrastructure required by a specific faith community.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS4071

**Person ID** 1262892

**Full Name** Jean Farrer

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Delivering Infrastructure to Support Growth Strategy comment** I fully support the One Voice Alliance in this section. I have commented elsewhere about the failure to address the infrastructure needs of Berkhamsted, Northchurch and Tring realistically. DBC is an enabler, not a provider. Stating that utilities and providers of services are required to provide them doesn't really guarantee that this is possible. Due to the narrow streets, lanes and canal bridges it is not possible to mitigate the increase in traffic which inevitably follows from this high density housing development. Improving facilities for walking and cycling is unrealistic in a valley with steep roads either side. I have referred to the health service being under pressure already in other responses. CPRE and the Chiltern Society raise important issues about essential utilities and the provision of water in particular.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS4096

**Person ID** 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 * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I agree providing in particular the schooling and healthcare provision is actually delivered. Clearly my comments elsewhere on reduced housing requirement obviously need to translate through into reduced requirement for these support services, although not completely as there is already underprovision of schooling and healthcare within the borough.</p> <p>In addition the less visible infrastructure such as water supply also needs to be delivered to avoid more water being removed from the chalk aquifer and further damaging the remaining green belt and AONB, Chiltern Beeches SAC and general local biodiversity.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4163
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Current infrastructures are totally inadequate and the IDP fails to address these key issues. Virtually no improvements have been made since the 2013 enquiry. The one exception being the Multi-Storey Car Park in Berkamsted which is likely to increase traffic flow problems.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4192
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Delivering the Infrastructure to Promote Growth</b></p> <p>Generally, to deliver this Plan of housing development will require a massive amount of infrastructure, which is mostly promised but not specified in the Plan. <b>So it's impossible to comment on.</b> To my mind the current road restrictions in Berkhamsted make accomodating more road users impossible. Public transport in the villages is practically non existent and has to be made worth while to the private companies that run them. GPs are hard to find, there are regularly shortages of water supplies in summer, car parking at the rail stations is already full to capacity. Secondary schools will be needed in our market towns for developments to be sustainable, and the topography and weather patterns make cycle routes for travel mostly suitable for leisure only.</p> <p>The suggested new road to connect the Hemel Garden Community to the M1, and the Leighton Buzzard Rd has obviously not been thought through. The latter road is congested in the rush hour and narrow with two compromised bridges with one way systems. The idea that traffic from Berkhamsted and Tring could be taken through to this road is not feasible.</p> <p><b>A long way to go with the infrastructure plan.</b></p> <p>.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4195
<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>Delivering Infrastructure to Support Growth Strategy 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>Building 1700 homes on thoe southern ridge line of Berkhamsted will create a huge increase in flood run off into the town. The water absorbent materials referred to in the document create only a marginal benefit compared to normal concrete. These constructions will also prevent the natural water absorbency of the land from doing its job.</p> <p>The area is already short of water resources - this plan is unthinkable until the country has an effective national water strategy so that water can be routed from surpus areas to deficit areas. Currently this is not possible.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4199
<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	No

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4224
<b>Person ID</b>	1264306
<b>Full Name</b>	Peter 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>Delivering Infrastructure to Support Growth Strategy comment</b>	In relation to education provision this Council welcomes approach of infrastructure needs being met by new development as set out in policy SP7 but would stress need to ensure that the timing of new education provision matches need arising from development to avoid exacerbating cross boundary education impacts. Specific discussions at planning application stage will be welcomed for those developments where new education provision is proposed.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4281
<b>Person ID</b>	1264327
<b>Full Name</b>	MATTHEW GITSHAM
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Concern regarding impact on infrastructure.</b> I am concerned that the proposed level of development would place a significant burden on infrastructure services across Dacorum, particularly as the plan does not do enough to address the improvements in infrastructure that would be required.</p> <p><b>Concern regarding water supply and waste water disposal.</b> One specific area of concern I have regarding infrastructure is about water supply and waste water disposal – we live in a water stressed area and the climate emergency will lead to further strain on water availability in the 2020s, which, with the scale of the proposed development, will lead to further extraction from the chalk aquifer, which will in turn cause further damage to the important chalk streams. New alternative water supplies would not be available until the 2030s at the earliest. The proposed development would also require increased waste water infrastructure which similarly would not be available until the 2030s at the earliest.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4284
<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
* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular, those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This disenfranchises probably more elderly sectors of the population, those who do not have easy access to the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion.</p>
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4286
<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> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I am <b>deeply</b> concerned that existing infrastructure is unable to meet the population's needs <b>today</b> and I firmly believe that this should be addressed <i>before</i> we start talking about infrastructure for another thousand homes per year growth.</p> <p>In recent months, the area has sustained flooding despite the fact that rainfall has been nominal. This suggests that drainage is insufficient. Another thousand homes per year is hardly going to improve the situation.</p> <p>Examples of egresses for new developments that I have seen so far, seem quite inadequate and in my humble opinion, will only fuel congestion on our roads, specifically at peak times.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4294
<b>Person ID</b>	1262647
<b>Full Name</b>	Carolyn 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>Delivering Infrastructure to Support Growth Strategy comment</b>	It is encouraging to see a policy to ensure that infrastructure is in place to support new housing developments, but the council must ensure that these policies are adhered to and developers are required to make the necessary contributions. However, while the council may have the right intentions we know that many of these issues are not in the council's control - roads, particularly motorway junction improvements, schools, medical facilities, public transport are all areas not controlled by the council. How will DBC ensure that these necessary improvements are achieved BEFORE the additional houses are built?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4311
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	10.3 'digital' infrastructure to be included alongside 'telecommunications'. 10.4 does the road infrastructure need to be listed first? Gives the wrong impression about growth. SP7: reference to HGC IDP is needed.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4323
<b>Person ID</b>	1261265
<b>Full Name</b>	Richard Case
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Infrastructure</b></p> <p>In Berkhamsted the roads on the south of the town are already overloaded. Apart from the A41 going around the town, the only East West route is the High Street (A4251). Shootersway and Durrants Lane are already stressed by the recent housing development (Bearroc Park). Substantial additional housing as proposed to the south of Berkhamsted and additional supporting facilities, such as schools and GP surgeries, cannot be supported by the existing road and utilities network. We have particular concern over the provision of adequate water infrastructure.</p> <p><b>Water supply &amp; Chalk Streams</b></p> <p>The area is already showing signs of water stress. Our chalk streams are a precious ecosystem under pressure everywhere, but especially in the Chilterns. At least a decade of work is need to upgrade the supply of fresh water and waste water treatment necessary to support any material increase in local population.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4332
<b>Person ID</b>	1264334
<b>Full Name</b>	Paul 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>Delivering Infrastructure to Support Growth Strategy comment</b>	We have seen a large growth in housing but no support for rail infrastructure. The trains are packed and the tran stations (Apsley, Kings Langley) at capacity. Things have been bad enough for Sir Mike Penning to get involved to increase the

number of trains stopping to cope with the increase in commuters. I cannot see what you can do as the trains are at capacity and the train stations lacking in facilities.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS4358

**Person ID** 1264342

**Full Name** Ms Hilary Lawson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** 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.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS4405

**Person ID** 1264312

**Full Name** Angela Delglyn

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Assuming the development to the east of Tring goes ahead, it should include a 'ring' road to draw traffic away from the Brook Street run and prevent extensive bottle necks in the Silk Mill area. This will be required from the outset.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4452
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4523
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy 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. 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.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4575
<b>Person ID</b>	1145918
<b>Full Name</b>	Mr Richard Tregoning
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No
* <b>Yes</b>	
* <b>No</b>	

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4605
<b>Person ID</b>	490893
<b>Full Name</b>	Mrs christine kavanagh
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Before a significant number of new houses are built in Dacorum, there should be specific plans laid out to address key infrastructure issues in this area.</p> <p>In Leverstock Green, we have critical problems in the Green Lane area relating to frequent flooding . This prevents access from Green Lane to the M1 and has caused flooding in the new housing development off Green Lane, in Kingcup avenue. There has been no attempt to properly address this flooding, even though it has happened regularly for the past 30 years. The proposal to build more houses on area HH25 and HH26 is problematic as these houses are to be built around the site which floods regularly and these buildings will also put too much pressure on an already inadequate sewage system in this area.</p> <p>There is a critical situation with the sewage drains running between Green Lane and Greenacres. Houses in Delmar avenue and Westwick row have recently been flooded with raw sewage which has resulted from blocked drains running from the new housing estate between Westwick row and Pancake Lane. There have been a number of similar incidents in Delmar avenue in recent years. This sewage infrastructure needs a major overhaul before more houses can be built in this area.</p> <p>There is also the important issue of congested roads as Dacorum is a major conduit between the M1/A41 /M25 . Unless more investment is made to ease this current congestion, there should be no more households added to our area which will only make this congestion worse. Siting housing estates in areas away from town centres means that people have</p>

to use their cars to shop and work and this will add to air pollution, road congestion and ultimately adversely affect our climate and quality of life.

This is not about people protesting about building homes in their area. This is about your residents recognising the current poor planning in this borough with regards to roads, sewage and flooding and realising that new houses will only exacerbate our current problems. I approve of the council plans to build homes on brownfield sites around the town centre which have good access to trains and bus networks. This is definitely the way forward rather than buliding on Green belt land away from the town centre and public transport links.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS4617

**Person ID** 1263004

**Full Name** Jill Townsend

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** I am far from convinced that the new homes proposed will be needed.  
The current infrastructure is not sufficient for people living in the area currently. Doctor's surgeries are over subscribed in Berkhamsted and Tring.  
  
Development of so many homes and a retail area on the site of Dunsley Farm will overwhelm the lovely market town of Tring.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS4670

**Person ID** 1264462

**Full Name** 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>This section fails to address issues such as the lack of a new hospital for the area. Hemel hospital has been downgraded and without the investment needed Dacorum does not have the healthcare capacity required for its population.</p> <p>The plan fails to address the issues of transport and traffic infrastructure, water and wastewater in and around Berkhamsted. I therefore object on the basis that the town's infrastructure is insufficient to support the proposed new development.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4712
<b>Person ID</b>	1264500
<b>Full Name</b>	GARY AND HEATHER FRIEND
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>And in addition other infrastructure needs to be part of any further housing. School places are in short supply; sports grounds &amp; facilities &amp; planning for cycling/walking etc.</p> <p>We need a comprehensive plan also including traffic, parking, public transfers into town etc.</p> <p>We cannot just keep building houses &amp; worse using greenfield land for it</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4727
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Has the proposed housing development properly taken into account all factors relating our local infrastructure and services?</b></p> <p>The creation of new housing stock necessarily involves recognition of the impact on essential services, such as the increased use of roads nearby and their requisite upgrading, the need for water and sewage disposal, the impact on air pollution, the availability of public services such as bus transport, schools and medical facilities. There is insufficient evidence that these factors have been properly taken into account. For example, it is apparent that there is to be a new link to the M1 from the Dagnall Road (B440) to Junction 8 with through traffic from the West and North accessing the B440 to get to the M1 and being discouraged from going through Hemel Hempstead using the A414. It is difficult to visualise how this will be achieved unless already inadequate roads, such as that along The Common through Potten End, are utilised. The road along The Common to Potten End which becomes Water End Road is a rat-run already and I and a number of neighbours have been activating for a reduction in the speed limit along a 3/4 mile or so stretch of this road because of the deer which frequent the woods which border the edge of this road. One day there is going to be another fatal accident along here attributable to cars travelling too fast, ignoring a speed limit which is much too high at 50 mph. The Hertfordshire road planning authority (which authority we are advised is the relevant one for this consideration) still have not ordained any reduction in the speed limit despite the likely unanimous accord of those living along that road who are only too aware of the dangers it imposes, especially to pedestrians using the pavement. I have been trying to secure a change in the speed limit for nearly 3 years now as my neighbours will testify. This route is likely to be inadequate for greatly increased traffic because in places it is too narrow and the access to Berkhamsted is over or via narrow bridges.</p>
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4746
<b>Person ID</b>	1264510
<b>Full Name</b>	Martin Evening
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The Dacorum DLP does little to address improvements in the infrastructure services and facilities in Dacorum required to support the proposed increase in housing.</p> <p>We live on Northchurch Common and have continuous problems with water pressure which drops so low and even stops during the summer months. The level of new housing proposed is expected, under drought conditions, to put severe strain on water supplies to Dacorum during the 2020s.</p> <p>The growth proposed by the DLP would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This could take years to complete and be extremely expensive as well as disruptive to the affected communities.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4765
<b>Person ID</b>	1264515
<b>Full Name</b>	SUZANNE JAMES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Infrastructure. The sheer volume of housing will have a knock-on effect to every town. The massive development in Tring and Berkhamsted as well as the proposed housing in Northchurch, will create a gridlock in the narrow Northchurch High street. There are no plans for playing areas or football pitches. Where will the children go to play? There are no plans for additional health services, our Doctors Surgeries are already over stretched.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4767
<b>Person ID</b>	1264515
<b>Full Name</b>	SUZANNE JAMES
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Water, Sewage and Waste Disposal. As a resident who lives in the valley, our road is prone to flooding. The drainage system already appears strained and I worry the volume of houses will only add to the fragile system in place already.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4795
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4806
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The plans would place unacceptable pressure on infrastructure in Dacorum
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4852
<b>Person ID</b>	1264519
<b>Full Name</b>	Neil Burton
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	In 2019, the Gade river ran dry and there will not be enough water to support all of these houses. We do not have a reservoir in Hemel and I see no plans to build one so I do not see how this will work with an increase of over 25% of housing. The numbers of houses are based on old, incorrect data and we will lose countryside and risk damaging the environment permanently. We would need more schools, hospital, amenities, non of which will eventualise as they do not make revenue. A few shops will crop up as with the canal development at Nash mills but what else happened there? Nothing. I do not believe for one second that the costly infrastructure changes will be made. All that will happen is that an extra bus route will be put on. We also talk about the amount of people who will not need cars in these developments. Honestly, how many people do you know without a car? The trips out of Hemel to see attractions, family, friends do we really believe this will all be done using public transport or on a bike? It will not hapen and all people involved know it so lets get real and plan for all of the additional cars (2 spaces per 1 bedroom apartment).
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4860
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	even if extra road infrastructure is provided for access to the new developmets there is no method available to increase the main infrastructure of berkhamsted town. This makes the extra housing proposed an unsustainable and indeed dangerous for road users, pollution levels and congestion. Pollution levels monitored by the county in the areas of lower kings road are already far above those allowed under WHO guidance which risks lug disease especially in the young

and old. Recent studies have shown how pollution of vehicles in town centres definitely contributes to death due lung disease.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS4863

**Person ID** 1264524

**Full Name** Karen Kang

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** The infrastructure and areas like health care facilities is absolutely key for development. With any kind of plan like this, it seems essential that the council are lobbying at both a local and national level to ensure that we have the best health care facilities possible. It is unimaginable that an area growing on this scale would not have its own hospital.

On the infrastructure around the Two Waters area the plan is not realistic - it also does not take into account the development already planned around the Chaulden area which would already add an extra burden onto traffic into area as there are no plans for that to add in additional access routes.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS4962

**Person ID** 1264544

**Full Name** Bethan Fox

**Organisation Details** Personal comment

**Agent ID** 1264539

**Agent Name** Bethan

	Fox
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I agree providing with the ambitions in this section of the plan, in particular the additional schooling and healthcare provision, providing it is actually delivered by developers. Clearly my comments elsewhere on reduced housing requirement need to translate through into reduced need for these support services, although not completely as there is currently under-provision of schooling and healthcare within the borough.</p> <p>In addition, the less visible infrastructure such as water supply also needs to be delivered to avoid more water being removed from the chalk aquifer with further damaging to the remaining green belt and AONB, Chiltern Beeches SAC and general local biodiversity.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS4969
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The history of infrastructure delivery by DBC has not been good in Berkhamsted. Development on the scale now proposed requires significant infrastructure investment and is mainly reliant on other bodies for significant investment and provision. Small scale fragmented sites make cohesive planning for infrastructure requirements more challenging and less likely to be met.</p>

Public transport is an unlikely scenario with a string of hill-top sites, as is walking and cycling. Road widening is unfeasible in the historic valley town of Berkhamsted. The suggestions made in the past have proved unworkable and little is suggested in the proposals to address the anticipated congestion.

Healthcare at GP and Acute level is of concern. Closures/mergers of both have occurred in the last few years and provision is inadequate for the current population

Sewage and wastewater treatment and network are at capacity, as acknowledged in paragraph 15.65 of the IDP. Apparently Thames Water and the developer will deliver - without any evidence that the infrastructure can actually be delivered.

Potable water supplies rely on extraction from aquifers. Affinity Water have had to agree to extraction limits with the Environment Agency and major investment is required to support new sources of water.

DBC say that "developers have a right to connect and development cannot normally be resisted on the grounds of inadequate water supply or sewerage capacity." This is a high risk strategy bearing in mind that there have been moratoriums on housebuilding in other parts of the country resulting from issues of sewage and water supply.

the issues have not been adequately addressed.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS5030

**Person ID** 1264555

**Full Name** Rick Freedman

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Delivering Infrastructure to Support Growth Strategy comment**

Whilst I support the key objectives of Policy SP7 ("ensure there is sufficient and appropriate infrastructure in place to meet the planned growth") the policy fails to address a proposal for current infrastructure shortcomings. It also fails to make concrete representations on how apparent infrastructure obstacles - for example the challenges of improve transport into and around Berkhamsted given it's topography - may be addressed. Instead the policy merely refers to undertaking an IDP plan, giving no confidence in delivery of any such improvements. Local Residents experiences have constantly been of immediate housing growth, and promises of future infrastructure improvement. So whilst the policy of having the

infrastructure in place prior to the the growth is commendable, I am not confident that the council will deliver this - primarily due to the very small list of developers that DBC are willing to deal with due to the size of the individual sites.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS5033

**Person ID** 1264557

**Full Name** Natalie Crane

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** 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.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS5046

**Person ID** 1263960

**Full Name** Mr Tim Amsden

**Organisation Details** Chairman  
Tring & District Local History & Museum Society

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The desire to promote movement other than by car is laudable, but placing a new supermarket in the centre of Tring makes a mockery of this idea. It would do precisely that which SP7 1a sets out not to do. Provision of new health care facilities presumably means new surgeries, but fails to recognise the inevitable pressure new development would place on the inadequate local hospitals, over which you have no influence.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5056
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5097
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>In Berkhamsted, we are currently suffering from a lack of infrastructure for existing and recently completed housing developments. This is not the time to place additional burdens on already broken systems.</p> <p>We have roads that are far too busy - for example single track lanes that now have high car and lorry usage (e.g. Bank Mill Lane and the bridge across the canal) owing to extensive infill development.</p> <p>We have sewerage systems that are simply not able to cope with volume (leading to sewage escapes onto roads at multiple sites, for example opposite the Old Mill Pub on London Road, and up to No. 4 on Hall Park).</p> <p>We have uncontrolled surface runoff which leads to cascades of water down the roads into the valley as all drains become full and flooded in heavy rain.</p> <p>We have problematic access to Schooling (students bussing out of Berkhamsted to Hemel Hempstead, Chesham and Tring on a daily basis) and oversubscribed schools.</p> <p>We have problematic access to NHS facilities (despite recent mergings)</p> <p>These issues should be fixed by infrastructure improvements in advance of any further house building.</p> <p>The planned South Berkhamsted Development, and the other edge of town Green Belt developemnts will undoubtedly lead to increased problems in all the above areas, and no doubt others. Our experience is that promised improvements to infrastructure after development simply fail to materialise.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5110
<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>	No

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5155
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I agree providing with the ambitions in this section of the plan, in particular the additional schooling and healthcare provision, providing it is actually delivered by developers. Clearly my comments elsewhere on reduced housing requirement need to translate through into reduced need for these support services, although not completely as there is currently under-provision of schooling and healthcare within the borough.</p> <p>In addition, the less visible infrastructure such as water supply also needs to be delivered to avoid more water being removed from the chalk aquifer with further damaging to the remaining green belt and AONB, Chiltern Beeches SAC and general local biodiversity.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5199
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	My understanding is that water is in limited supply. Surely that needs to be sorted out before anything else. More public transport please - electric buses in and between towns.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5211
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular, those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This disenfranchises probably more elderly sectors of the population, those who do not have easy access to the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion and will not achieve buy in as a neighbourhood plan.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5260

<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Policy SP7-Delivering Infrastructure.</b> This policy is acknowledged to be a key factor in accepting and supporting growth and the perceived inadequacy of infrastructure is commonly used by those that object to growth.</p> <p>The draft IDP produced by DBC is welcomed and has been inspected together with the relevant schedule for Berkhamsted.</p> <p>We accept the principle in Policy SP7 that new development “will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal in order to: a. meet the needs <u>arising from the development</u> so as to avoid placing additional burden on the existing infrastructure; b. avoid or mitigate adverse social, economic and environmental impacts arising from the proposed development; and c. make good the loss or damage of social, economic and environmental assets arising from the proposed development”</p> <p>The words we have underlined above “arising from the development” are considered to be key.</p> <p>Policy SP7 then states that “Infrastructure requirements will be delivered directly by the developer and/or through an appropriate financial contribution prior to, or in conjunction with, new development. Where appropriate, developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site”</p> <p>The BSG accepts the need for a degree of coordination to growth and understands and accepts that site BK03 will need to carry its appropriate share of infrastructure costs. However, a considerable amount of further work is required by DBC and their consultants and we will wish to discuss this matter in detail with DBC officers as the plan progresses, to ensure that any costs are directly linked and fair and that the timing is also appropriate. It is important to ensure that there is no double counting with other already established forms of infrastructure funding such as CIL, which is a very high cost in Berkhamsted.</p> <p>The coordination of infrastructure must also have strong regard to the timing of housing delivery. Site BK03 is a relatively small and relatively stand-alone site compared with many others in the draft plan. Site BK03 is available for delivery without the need for significant wider infrastructure and can contribute to DBC’s land supply at the outset of the plan period. DBC will rely upon smaller sites such as BK03 to maintain the required level of housing land supply and, in order</p>

to fend off unwelcome applications in due course on other sites. It should be recognized that some other very large draft allocations are likely to take longer to deliver, due to specific infrastructure needs.

We wish to reiterate that the early receipt from site BK03 will be invested directly back by BSG, immediately into enhanced sports provision at Haresfoot, but also then into other local infrastructure projects with wider community benefits.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS5276

**Person ID** 1264532

**Full Name** Robert Clarke

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** The proposal for additional roads particularly to create a road joining the M1 at junction 8 to the B440 will put huge pressure on the Hemel Hempstead to Leighton Buzzard road especially at Water End and the villages of Potten End and Great Gaddesden and Little Gaddesden.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS5278

**Person ID** 1263726

**Full Name** Andrew Gifford

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Closure of Hospitals, amalgamation of Doctors surgeries, over subscribed school system, crumbling roads and infrastructure, over price transport facilities (Bus/train), privatisation of sports public sports facilities, lack of safe cycling infrastructure, closing town halls and police stations does not present good value of investment for public funds.</p> <p>The current plans for investment in Watford general as the main Hertfordshire hospital have been shown to be outdated, expensive and will take the usual sticky plaster approach Vs a brand new facility with better links, access and facilities. Given the emerging strategy your plans are outdated and have been ill consulted. As example I received notification 4 days prior to the deadline once again poor and substandard</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5327
<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
* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5356
<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 * No	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5399
<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 * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>What I like about Hemel is how green it is with most of the estates having large parks and green corridors. The new estates must also be built with large parks for recreational use.</p> <p>Safe walking and cycling routes must be part of the infrastructure and at least connect the new estates with Maylands and also the train station. If more houses have to be built in Bovingdon there must be a safe walking and cycle route to the train station. At present the High Street is very congested with cars and lorries. Box Lane is very frequently being dug up / closed for one reason or another; there is not the road infrastructure for more houses. When the market is on, especially in December, the village gets in effect cut off by the number of vehicles trying to access the market.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS5420
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>By developing in the South of Berkhamsted you will lead to the continued overuse and overwhelming of current infrastructure. The roads in the south of Berkhamsted are already overused. The road at the top of Kings hill has had to be dug up at least 6 times in the last 4 years and it continues to need addressing. Wherever there is significant rainfall the water runs off into town. It does not properly drain and leads to flooding in and around Victoria school.</p> <p>This has been happening year after year.</p> <p>If this hasn't been sorted despite it being raised repeatedly, then it will only be excaserbated by further building to the area at the top of Kings hill. Instead of the water naturally draining away into the fields etc. around here it will also run off into town and cause even more of an issue.</p> <p>The above is just an example to show this has not been thought through.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5431
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The IDP fails to sufficiently address issues relating to water, waste water, transport and schooling and is incomplete. Current infrastructure is insufficient in Berkhamsted and the proposed expansion will overwhelm the town.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5464
<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	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5539
<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

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	There must be a firm commitment to protect local water sources and ensure they are not over-stretched. There must be a refusal to permit any discharge of sewage into local rivers under any ciand a requirement that sufficient excess capacity is built into the sewage system. There is no realistic consideration given to the impact of increased traffic on congestion and air quality. Sensible consideration of these points leads to the conclusion that the proposed developments in Tring and Berkhamsted are not sustainable because the necessary infrastructure is not in place, nor can it realistically be put in place.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5603
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The proposal takes no account of Berkhamsted's geography and valley setting, with most building to be along the top of the valley.</p> <p>There are no significant proposals for improvements to troads or traffic flow. All additional traffic created will feed onto Shootersway and Kings Road towards the station. As a Kings Road resident, this is of key concern to me as the road is already busy and pollution high in this area.</p> <p>There have been no proposals made to improve walking/cycling/public transport routes in the Berkhamsted area and no improvments to public open spaces.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5620

<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Infrastructure to support the housing development in Berkhamsted are woeful. Dacorum is proposing to develop land which is served by country lanes and doesn't even have mains gas and sewage or fibre broadband. Dacorum has already given permission for several developments along Shooters Way which have increased traffic and accidents. the traffic lights at the junction of Shooters way and the A416 are badly designed already disrupt traffic flow from Shooters Way to the A41. What thought has been given to flood management, gas, sewage, drainage, road improvements to support this development?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5633
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	R]

Infrastructure in all its forms should be upgraded and provided before development takes place. Development ahead of commensurate infrastructure will significantly compromise the quality of life of existing communities as well as the developments.

The cost of infrastructure upgrading and provision should be largely borne by developers and builders who will be the greatest beneficiaries of the plan. Dacorum should not bear the majority cost of such work, notwithstanding its receipt of significantly more council tax and business rates.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS5636

**Person ID** 1264689

**Full Name** Philip Hobden

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** Delivering Infrastructure to support growth – the IDP fails to adequately address issues, including traffic, water and wastewater, local surgery and hospital utilisation, and is incomplete which reflects the reality that infrastructure always lags the development it is meant to serve.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS5725

**Person ID** 1264473

**Full Name** Jane Read

**Organisation Details**

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The identification of Long Marston as a site for a huge development completely goes against what you say in 10.3: There is NO transport infrastructure which could support a large development + very narrow local roads There is risk from three types of flooding [not just a <b>risk</b> - Long Marston roads and surrounding land were flooded this winter not for the first time] Very limited local services - no shop in Long Marston + one small primary school
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5726
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5763
<b>Person ID</b>	1264460
<b>Full Name</b>	Jonathan 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>This is not the easiest of consultation forms to complete. It has been made particularly difficult i.e negotiating the wood to find the trees and I am still uncertain as to whether I have arrived at the right place. I have formed the impression that the proposed plans for this obscene mass house building is going to be forced on the residents of Dacorum Borough with or without proper consultation and whether we like it or not.</p> <p>My Family have lived in Wootton Drive for 40 years and the reason we moved here was the tranquility of the area, the adjacent peaceful countryside with its profusion of wildlife and the open habitat of many species of birds and wild animals. All this to be destroyed on the false demand that it is required by the government to build thousands of new homes in the vicinity of North Hemel Hempstead where there is insufficient water supply, no plans for Hospitals and medical centres, schools and much more. Life here will be impossible with the amount of building work required, thereby destroying the environment, so reluctantly we will leave Dacorum after being so happy here. The proposed area to be built on is also crossed by ancient bridleways and woodland which will be permanently lost. It is also a flood plain as has been recently proved that the land cannot absorb the amount of rain liable to fall at certain times of the year.</p> <p>I urge you to think again. The quality of life as we know it will be lost and the unique character of our pleasant town destroyed forever by this mass building programme of which everyone I speak to opposes most strongly.</p> <p>Jonathan Nicholls.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5785
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5800
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Your infrastructure plans are good, but built on flawed assumptions of increased office, retail and housing needs that Brexit and Covid have rendered obsolete.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5832
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Tring can already suffer from excess car usage from locals, and a large number of visitors. Any further additions to the housing will place further burdens on the narrow streets and town centre carparks.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5848
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The title of 'Delivering the Infrasstructure to Support Growth' appears to be an empty committment.</p> <p>Where is there specific mention of any new infrastructure planned.? After all the recent growth in housing in Berkhamsted there are no new GP surgeries. (juyst consolidations), no new schools, no safe cycle ways. No improvements to roads or traffic flow. No improvements on water supply or waste water disposal. No proposals to improve walking, cycling, public transport routes around the town.</p> <p>The transport study takes no account of Berkhamsted's geography and valley setting. Most building is proposed along top of valley. All the shopiing is at the bottom of the valley. All additional traffic created would feed onto Shootersway, and New Road and both are narrow roads. Just opne dangerous entry and exit point onto the A41 already heavily congested in normal times.The queues along High Street are returning to pre by pass days, contributing to increased pollution.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5857

<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Infrastructure cannot cope as it is services already suffering lack of parking pollution flooding all
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5879
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I agree providing with the ambitions in this section of the plan, in particular the additional schooling and healthcare provision, providing it is actually delivered by developers. Clearly my comments elsewhere on reduced housing requirement need to translate through into reduced need for these support services, although not completely as there is currently under-provision of schooling and healthcare within the borough.</p> <p>In addition, the less visible infrastructure such as water supply also needs to be delivered to avoid more water being removed from the chalk aquifer with further damaging to the remaining green belt and AONB, Chiltern Beeches SAC and general local biodiversity.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS5936
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Berkhamsted's infrastructure - particularly water and traffic - is woefully in need of improvement. This is before any extra houses! This plan would lead to multiple costly failures.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6018
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The infrastructure in Berkhamsted is already insufficient for the number of residents. Schools and doctors surgeries are already stretched. The plan fails to adequately address issues such as traffic, water, and waste water

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6063
<b>Person ID</b>	1145998
<b>Full Name</b>	Mrs Pauline 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Traffic implications of a development are provided by the developer, not an independent consultant and not by someone who knows the area which leaves it wide open to inaccuracies and abuse.</p> <p>The implications of noise should be considered as it carries right across HH. Tower blocks with open gardens and sport facilities on the top should be rejected as any evening gathering will cause really disturbing noise</p> <p>Currently use of paths and buses is hampered by flooding which has been ignored for years.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6088
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6099
<b>Person ID</b>	1154912
<b>Full Name</b>	Simon Chilton
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Secondly, the Local Plan should not be finalised until the Infrastructure Development Plan (IDF) mentioned in 10.2 has been completed to a level similar to the HIPP described in !0.4. There could be significant environmental issues arising from the Infrastructure needs (eg. water delivery) and it is also not clear whether the housing land requirements identified includes an allowance for infrastructure land.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6124
<b>Person ID</b>	1264826
<b>Full Name</b>	alanah cullen
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The proposed level of development in Dacorum, along with pending development in neighbouring St Albans City and District, Three Rivers District, and in Buckinghamshire east of Aylesbury, would all 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 increase in housing.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6141
<b>Person ID</b>	1264772
<b>Full Name</b>	Adrian 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>	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6185
<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> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I agree providing with the ambitions in this section of the plan, in particular the additional schooling and healthcare provision, providing it is actually delivered by developers. Clearly my comments elsewhere on reduced housing requirement need to translate through into reduced need for these support services, although not completely as there is currently under-provision of schooling and healthcare within the borough.</p> <p>In addition, the less visible infrastructure such as water supply also needs to be delivered to avoid more water being removed from the chalk aquifer with further damaging to the remaining green belt and AONB, Chiltern Beeches SAC and general local biodiversity.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6196
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Improvements to existing infrastructure, especially transport infrastructure, should be as important as development of new infrastructure for any planned growth, especially with poor road quality in many rural areas. I am also skeptical of how community infrastructure can handle a population increase when it seems to struggle with the current population.</p> <p>If Dacorum is to expand, more healthcare facilities need to be available. Emergency services already need expanding in the borough with the current population.</p>
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6211
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6239
<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	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6312
<b>Person ID</b>	1263842
<b>Full Name</b>	Karen 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>10.3 There is insufficient information on any new roads proposed: Shooterway in Berkhamsted is already at capacity at peak times and the additional houses at Bearroc Park are going to add to this substantially. Are the developments at Bearroc Park and Roman Park included in the figure of 2,200 houses and 2,700 houses?</p> <p>10.3 Where is the information about new primary and secondary schools - they are needed now, not after the houses have been built. Ashlyns School has nearly three times the applications compared to allocations and Tring School, more than double,</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6324
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	It is our experience that infrastructure only follows development. Schools are not built until sufficient children have no place to go with surplus demand being housed in portacabins. A very important element of primary school provision is its role as a community hub. Developers build houses not communities. Transport facilities are geared very much to past figures with no enforceable strategy for sustainable transport eg cycle routes and pavements built into planning permission. For example limiting the number of parking spaces does not decrease demand for them, providing buses might help but safe routes for pedestrians and cyclists are only part of the solution.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6364
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I'll believe it when I see it!
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6372
<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>	

Yes / No * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6405
<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>	
Yes / No * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Development on the scale proposed will have significant impacts on traffic levels, as well as issues such as waste disposal and water use. There is little concrete detail as to how these issues will be addressed.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6440
<b>Person ID</b>	1264937
<b>Full Name</b>	Danny Killeen
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>There is no detail of how road traffic capacity enhancements will be made. East of the planned HGC there are further open fields to potentially accomodate connection to J8 of M1. West and North there is no current road capacity to accomodate any increase in traffic. The Water End one way bridge is an obvious bottleneck which cannot be overcome without the full replacement of the bridge and likely distruction of houses to the East/North of the Bridge to accomodate that (and these houses are in a conservation area).</p> <p>An alternative route for the road East and North of the Gade river would make sense, but in an AONB is this likely or even possible? So what is the answer? The roads leading either way through Potten End are narrow and only lead to futher narrow roads when entering Berkhamsted. Avoiding Berkhamstead (which is advisable) would direct traffic along Leighton Buzzard/Dagnal Roads and encounter the one way bridge. Again, what is the answer to this - this proposal cannot progress without a definitive plan to address the throughput of vehicles in the area. The current road infrastructure will not cope, and does not cope with queues for the one lane bridge regularly back past the Water End Garage.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6450
<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> * <b>Yes</b> * <b>No</b>	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS6482
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	How are you going to change the fact that Berkhamsted is a linear town built in a valley with one main road going through it and main narrow roads leading up the valley on each side. There is no space to improve these for the increase in traffic that will occur with the increased numbers of cars that will want to go into the centre from the new proposed sites on the outskirts of the town. And if these people are not expected to go into town then the houses good be built in a purpose built new town.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6509
<b>Person ID</b>	1264967
<b>Full Name</b>	Caroline Kelly
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I do not see any evidence in the local plan of improvements to infrastructure - Tring is currently struggling to retain a High Street that is not sinking with little evidence of clearing of drains/ ditches to prevent flooding - just look how often the A41 is partially closed around Tring in evidence.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6539
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The one medium sized supermarket, Tesco, has already led to the loss of other smaller shops and the high number of empty shops, charity shops and estate agents in the high street and elsewhere. People from Tring travel by private car to use the larger supermarkets in Aylesbury or Berkhamsted. For main comparison shopping they use Milton Keynes, Watford or Aylesbury. Nothing on the proposals will change this to any significant extent - it may however increase the number of vacant shops in Tring high street.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6570
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	This plan is missing detailed commitments for sewage, water, broadband, electricity, gas, healthcare, and adequate schools, recycling and community provision. These infrastructure proposals do not meet the proposed demand and in some cases, current needs. Cars have to get to the motorway, and ensuing traffic jams will worsen health and quality of life for residents, even if the improvements to motorway junctions are sufficient for this added demand. Once the planning permission is given for the houses, how will Dacorum ever raise the money for the infrastructure that is needed by them?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6572
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6576
<b>Person ID</b>	1265011
<b>Full Name</b>	Rebecca Staples
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I can't see any mention of parking!?! Surely part of the long-term plan for Tring is to encourage people to come to Tring and support the failing high street - where are they supposed to park!?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6681
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The plan is sparse on detail relating to infrastructure. This lag in infrastructure planning is consistent with recent experience, where housing has been prioritised without additional investment into education, healthcare, water and wastewater management. The plan refers to additional schools - but does not identify sites or provide support for funding. With an additional 16,600 homes, and additional 30,000 school places could be required. Without additional funding Ashlyns would not be able to accommodate the additional secondary school population of Berkhamsted - already pupils are forced to Hemel schools without adequate public transport links or safe cycleways.</p> <p>The reduction of Dacorum hospital care, while proposing 25% population growth is flawed. The commute to, the parking costs and the strain on existing capacity at Watford hospital is not addressed at all in this document. How can the plan be proposed without detailed regard for such critical service provision - particularly at a time when government spending is expected to be stretched (highest levels of government debt since 1960's) following the COVID support required.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6687
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	I endorse the response of the chiltern countryside group. I also don't think that this should be happening at this time.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6717
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Whilst the improvements at junction 8 in Hemel and the new roads added here will help with access to the M1 the wider implications in Tring and Berkamsted with vast increases in housing have not been addressed. The roads are already busy throughout the days and rush hours there are major congestions in the whole area.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6741
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<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 will have detrimental effects to Tring and Berkhamsted, as these market towns are not built for the increase in traffic, waste, or water. As well as the dramatic increase in demand for medical appointments, education, and retail.</p> <p>Why are no new medical centres, pharmacies and opticians being considered in the plan, these are vital services, which will need to expand when the population does. Additionally, how do you expect the smaller roads and lanes to cope? There are a lot of developments which use Shootersway, in some places, this becomes a single track road. Darrs and Durrants lane are also extremely narrow and small. How will these roads cope with the increase in traffic? All of this needs to be re-considered and plans for these roads need to be included.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6747
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy 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.  This comes across as corporate waffle. I endorse CCG response to this
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6764
<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>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The plans are not sufficient enough to support the size of developments planned!
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6802
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>It is impossible to provide sustainable transport infrastructure in berkhamsted. Cycling is not an option when you have such significant hills. good intentions will be replaced by car journeys very quickly, leading to congestion and pollution huge bike theft problems at the station change intentions</p> <p>the Bk01 south berkhamsted site will have 800 units. Assuming a 2 adult house hold, each travelling by car, leads to 3200 extra rush hour journeys each day in the local area, which the local infrastructure cannot support. And the South Berkhamsted site will have high car usage given the steep hills and distance from the train station</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6861
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	We have already seen significant development without sufficient infrastructure. How will this be different?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6874

<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The strategy document does not adequately address issues such as water, wastewater (for which no agency appears to be willing to take responsibility) and transport. With all the talk of sustainability, and the government's commitment to it, this strategy is positioning the bulk of the houses in Berkhamsted up steep hills from all amenities and main transport links. In reality, this means all but a few residents in those houses are likely to use cars to get in to the centre of town. This would increase pollution level in the town that are already documented to be high, and further exacerbate the already high congestion levels.</p> <p>There is no way a plan as overwhelming to a community as this one is to Berkhamsted should be approved without concrete and adequate plans for infrastructure in place.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6875
<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	No

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6882
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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. With no employment strategy for Berkhamsted, the 2,200 dwellings will result in significantly increase traffic, congestion on train services (already at capacity at peak times during pre-COVID) and pollution to unsustainable levels.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6890
<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

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I don't feel that the proposal adequately addresses the increase in traffic nor the increase in water demand.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6914
<b>Person ID</b>	1265058
<b>Full Name</b>	Rick Ansell
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	Yes
* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The Strategy will have a very major environmental impact. It will not be possible to make good this loss. Loss of Green belt is permanent. Green Belt cannot be 'made good' or recreated. An artificial public park is not Green Belt. It does not have same environmental characteristics as genuine natural countryside. It will not attract the same wildlife. At present, for example red kites nest in and patrol the proposed area of development. Muntjac browse the fields.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6952
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The proposed infrastructure improvements are woeful in the face of 16.5k new homes. Too many assumptions are made that building/improving cycle paths will significantly change car use, especially from October - March.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6983
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	When Hemel Hempstead New Town was developed, most of the infrastructure was put in place before other developments. I am not sure that Policy SP7 is going to deliver infrastructure in a timely fashion.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS6993
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	What about the increase in visters to recreational and local beauty spots already there is little capacity to park around Tring Reservoirs, Tring Park, canals and other places that people come to visit ?Will someone have to be seriously injured on local roads before this is addressed, and what about the impact this increased number of visitors will have on teh local wildlife?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7092
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The DLP 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 and especially true in Berkhamsted.  The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7106
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate. Current infrastructure in Tring (schools, GPs and transport) is inadequate and a 55% increase in housing is totally unsustainable.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7129
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Berkhamsted is located in a valley bordered by the A41 on one side and AONB on the other. The infrastructure within this boundary is already bursting at the seams and the towns street network is already suffering from significant congestion and well-documented parking issues. The topography and layout of the town simply doesn't allow infrastructure to be easily added, roads to be widened or cycle routes to be built within the town.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7131
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Delivering Infrastructure to support growth The IDP does not address traffic, water and wastewater issues sufficiently, nor is it complete. It is unthinkable to proceed with a development of this size when the reality is that the infrastructure will not support it. All that will result will be a broken town, where Berkhamsted used to thrive.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7167
<b>Person ID</b>	1265158
<b>Full Name</b>	Megan Fleetwood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I think there has been a massive oversight on the infrastructure in both Tring and Berkhamsted and the additional demands these houses will create. The proposed developments will overwhelm Tring in particular, with the disproportionate number of houses being planned. The High Street and parking would not cope with additional traffic - you only have to see the current arrangements in the High Street when a delivery is required to one of our shops - the High Street was not designed for commercial deliveries to the extent they are required now and it is often blocked whilst these are undertaken. Adding an extra 55% of housing to the current population would have a huge impact on the town centre

and would undoubtedly get gridlocked very quickly. Throw in the chaos that is often seen on the A41 and traffic being redirected through the town and you can only imagine the problems that might be caused.

We have also not yet seen the true extent/impact of the Roman Park development which is underway.

Having moved to central Tring ourselves with 3 primary aged school children, we were unable to get places at any of the Tring Schools and were placed in one of the surrounding village schools. The schools are already full to bursting and our own dilemma of having to drive to a school out of town perhaps shows that the addition of any extra schools could potentially be filled with local residents rather than those purchasing the planned housing.

There is also the worry of insufficient local jobs and the extra commuting this itself will bring.

I am not alone in these concerns and would welcome further investigation in to the current infrastructure of the High Street, the Town, the roads, the schooling and the local jobs before any plans are passed.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS7177

**Person ID** 1265157

**Full Name** Lynnsey Walker

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

**Delivering Infrastructure to Support Growth Strategy comment** The proposal in so far as it relates to Berkhamsted is woefully inadequate in terms of education, health and transport.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS7190

**Person ID** 1265131

**Full Name** Malcolm Appleford

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7191
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Tring is so limited in it's ability to cater for such a massive increase in vehicular traffic!
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7230
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7237
<b>Person ID</b>	1263579
<b>Full Name</b>	David Fleetwood
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	It is my view that the town of Tring will not have the capacity to support the suggested developments and increase in housing that these bring. The roads around the towns are not large enough to support such an increase in traffic and residential parking is already a big problem in the town. The High Street itself is not designed for a large increase in traffic as it is very narrow in places, and a disproportionate amount of new housing would create such a high volume of visitors that the town centre would not be able to cope with the pressure. I hope that the current plans can look further into the improvement of the existing infrastructure of Tring before any big decisions are made, the quality of the the roads we have already is not good and any more traffic on them is only going to exacerbate the problem.
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7268
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>10.8 The precise mechanism for securing infrastructure is being reviewed and will need to take into consideration the outcome of the White Paper consultation. Subject to this, we intend to produce a supplementary planning document to guide delivery.</p> <p>Well you should supply it now. I don't think this is sustainable that why you don't know how its going to happen</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7311
<b>Person ID</b>	1265182
<b>Full Name</b>	JAMES NODDER
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Water supply &amp; waste water disposal</p> <p>The number of additional dwellings will put strain on the supply, especially in the likely drought conditions. This would mean drawing more water from the Aquifer causing adverse environmental consequences.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7368
<b>Person ID</b>	1265362
<b>Full Name</b>	ROSEMARY NORTH
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I am responding by email as your website is not allowing me to submit comments.</p> <p>Whilst I realise that there is a great need in Dacorum for affordable housing, the projected sites for housing in both Berkhamsted and Tring are well away from the town centres, which will necessitate travel by car. There is already a lack of adequate parking spaces in both towns.</p> <p>Why is there a proposal to put a new supermarket on the Dunsley Farm site when there is a large Tesco opposite? Another supermarket should be located to the east of Tring where new housing is proposed. However, putting housing in that area will significantly detract from the current rural views in an area of AONB. Brownfield sites should be used instead of cutting into the Green Belt, which should only be touched in exceptional circumstances.</p> <p>The plan does not clearly explain in what ways Dacorum Council will mitigate Green Belt loss and meet the County's goals for climate change and carbon reduction. Where will car charging points be located? Currently there are only a few located in car parks in Berkhamsted.</p>

Only one new school is proposed for Berkhamsted, on the west side of the town. However, on the south side there are major housing development proposals and Swing gate School and Thomas Coram School are both currently full.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS7444

**Person ID** 1265383

**Full Name** RUTH NEWCOMBE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

I strongly object to the proposal of some 3400 new homes to be built around the small peaceful village of Long Marston.

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.

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.

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** Delivering the Infrastructure to Support Growth

**ID** EGS7452

**Person ID** 1145699

**Full Name** Mr Paul Walker

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

**Consideration to local infrastructure**

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.

Overall, I have great fear for our community and what impact this would make if some of these areas are not addressed. I might have been in a position to provide a broader picture of community concerns, if we were not in the midst of a global pandemic!

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS7512

**Person ID** 1265572

**Full Name** DAN STOBBS

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy 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, especially here in Hemel Hempstead. We currently have a hospital that lacks many key departments such as an A&E or a 24 hour urgent care centre and is constantly seeing departments and services removed and relocated to Watford, not enough GP surgeries for the existing number of residents across Dacorum, we no longer have a walk in police station or adequate police staffing numbers, or sufficient schools or residents' parking. Building more housing is going to make all of these areas much worse, particularly when the proposed infrastructure is severely lacking.

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** Delivering the Infrastructure to Support Growth

**ID** EGS7647

**Person ID** 1265750

**Full Name** Mrs Shirley Thomson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I understand people need homes but also need entertainment, a replacement for the Pavilion was promised , not everyone is interested in sport. Hemel used to be a good place to live but now the young people have got nothing ,it may look nice but with nothing to do and no hospital for the amount of people that will be living here is a disgrace.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7660
<b>Person ID</b>	1265753
<b>Full Name</b>	JANE CRESSWELL
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	— There is no plan to improve infrastructure meaning increased traffic congestion, — further damage to internationally recognised chalk streams such as the Bulbourne — reduced water pressure — there is no plan for dealing with increased sewage
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7789
<b>Person ID</b>	1265904
<b>Full Name</b>	Mrs Alex 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>Delivering Infrastructure to Support Growth Strategy comment</b>	My second objection relates to the infrastructure of Berkhamsted. These plans will quite simply put an incontrovertible strain on the town. There has been no planning, and no detail considered. The proposals for the changes to the infrastructure and all the fact that the of growth of employment is for out of town workers - not Berkhamsted residents - are not enough for the number of new homes proposed. Nor has any consideration been made for genuinely affordable housing - already a huge problem in Dacorum. The lack of decent quality public transport links are already woefully obvious in Berkhamsted - and the plans do NOTHING to address them or improve them. I am also gravely concerned about how existing roads in the town will further struggle. Many of the connecting roads between the A4251, the A41 and the new houses will become dangerous rat runs and detours - again - raising pollution levels, and endangering safety of residents with increased road safety issues. You need look no further than Swing Gate Lane to find a perfect example of this already in operation - BEFORE your proposed plans come into effect. The road has 2 schools on it, and a park with a play area. Parking is at a premium, and cars are parked on it fully, day and night. Swing Gate Lane, and the Hall Park areas are already used as short cuts to avoid traffic on London Road. The surrounding roads on the other side of Swing Gate Lane are already frequently used by speeding drivers as a cut through to the A41 to avoid the town. These plans will only make this situation worse, and create other needless problems in other areas of the town also.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7798
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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. Many of the towns and villages mentioned, especially Berkhamsted, Bovingdon and Tring are already very congested and at peak times the roads are gridlocked and the addition of development on the edge of town/villages will increase car based travel. These areas simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS7868
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8012
<b>Person ID</b>	398885
<b>Full Name</b>	Mr Barry 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>INFRASTRUCTURE</p> <p>This is a huge potential problem for the both the Dacorum community and Council Services alike. Over the years I have seen the population of Berkhamsted increase dramatically with new estates, infill projects etc with the following consequences:</p> <ul style="list-style-type: none"> <li>• Severe congestion in the town with the associated degradation in air quality.</li> <li>• Overcrowded doctors surgeries and lack of resource for social/ mental healthcare for many who do not have the financial resources to use private facilities</li> <li>• Overcrowded schools with parents having to fight for places for their children in schools that can provide them with competent education for the future.</li> <li>• Severe pressure of utilities especially water which we have seen in recent years ,even with the existing population levels , become a problem.</li> <li>• Increases in noise, poor air quality ,litter and for some, anti- social behaviour.</li> </ul> <p>The proposed development will have a major impact on the quality and pleasure of living and visiting the area. It has to be scaled back and supported with immediate commensurate infrastructure enhancements. Our local politicians have to deliver an unequivocal message to Central Government hat Dacorum cannot and will not be able to deliver reasonable, good quality , sustainable growth without the upfront infrastructure development in place from day one. Failure to do this will result in intense frustration for all the residents of Dacorum and will be reflected in future voting decisions.</p> <p>In conclusion I have no fundamental objection to reasonable additional housing, especially affordable, for those that need it. However any development has to be a programme that reflects the local communities immediate and longer term needs whilst maintaining quality lifestyles for all and not a housing numbers game.</p> <p>I hope you will include my concerns in your consultation and this will result in a positive result for the future.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8023
<b>Person ID</b>	1266029
<b>Full Name</b>	JAN AND GORDON BULLOCK
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>More Road Congestion</b></p> <p>The Plan appears to involve restricting the width of the already congested A414 through Hemel to accommodate a new Mass Rapid Transit system to Harlow, and other transport initiatives. It suggests traffic coming from Tring and Berkhamsted would use the new link road in North Hemel from the Dagnall Road (B440) to Junction 8 on the M1 rather than go through Hemel using the A414. The most direct route for traffic to get from the A41 to the B440 passes through Potten End before descending into the narrow streets north of Berkhamsted. It would then pass via one of three single lane crossings of the railway, (the sites of frequent accidents) before arriving at the already highly congested crossroads in the centre of Berkhamsted. No improvements are planned to existing roads and there is not a new link planned between the A41 and Dagnall Road. This would mean that Hemel's traffic problems would be exported to Water End, Potten End and Berkhamsted. There is no assessment of how these existing routes will cope with significantly increased traffic volumes.</p> <p><b>Digital Connectivity</b></p> <p>The Plan includes a commitment to the introduction of new digital technology but explicitly links it to new developments. Existing settlements which will not have new housing also need to be included in this commitment.</p> <p><b>Passenger Transport</b></p> <p>The Plan includes a commitment to improving passenger transport which is rightly regarded as essential for people living in the Borough, but again the implication is that improvements will be linked to the new developments. This needs to be expanded to include all settlements.</p> <p><b>Water Supply and Wastewater Disposal</b></p> <p>With the chalk aquifer already described as 'over-abstracted', and local residents only too aware of the fragility of their water supply, the level of new housing proposed will put severe strains on both supply and disposal.</p> <p>With a significant time-lag in the availability of new water supplies, I am concerned that the new developments will increase calls on the aquifer, potentially leading to significant inconvenience for residents but more importantly risking damage to the Borough's precious chalk streams.</p> <p>Dacorum and Affinity Water have recently spent time and money on improving the River Gate, only for this plan to put that improvement at risk.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8039
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The proposed building of a link road from the M1 and the B440 will almost certainly lead to an increase in traffic through Potten End, passing the village school, and ultimately into an already congested Berkhamsted.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8042
<b>Person ID</b>	1265099
<b>Full Name</b>	Helen & Matt Thompson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Thank you for the public opportunity to comment on the plans which are clearly comprehensive. The biggest challenge is that timelines are missing from these beyond phase 1 and phase 2 in some circumstances which makes it impossible to tell if the local infrastructure changes will happen at a minimum in parallel to the increased number of houses and

inhabitants. It will be a significant problem if these aren't managed properly. Especially in relation to expanding secondary school provision in Berkhamsted and Tring which is already a challenge. There seems to be significant focus on primary school aged children but whether the secondary provision will be available at the right time for local residents is really not clear and a significant concern to us as existing local residents.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8045

**Person ID** 1152837

**Full Name** Suzanne Jannese

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

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. We have particular concerns regarding the impact on water supply and waste water disposal.

The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030.

The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8083

<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8111
<b>Person ID</b>	1266066
<b>Full Name</b>	Shelley Greenaway
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8136
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Also please consider infrastructure such as schools, pressure of new builds on our already overstretched services such as the NHS and Police. The local roads are heavily congested and this must also be considered when adding to the local population.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8159
<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	

**Delivering Infrastructure to Support Growth Strategy comment**

**Insufficient infrastructure to sustain high growth numbers**

The draft Infrastructure Development Plan (IDP) is woefully underdeveloped, which is very concerning given the 25% increased growth.

The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan as proposed does little to address the improvements in infrastructure required to support the proposed increase in housing. In particular, there are concerns regarding the impact on water supply and waste-water disposal. The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020's under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer, despite it already assessed as being "over-abstracted".

Waste-water disposal is an area of particular concern in this area. In Potten End there are several houses that experience sewage backing up into their garden already.

**Major gap in transport plan between A41 and B440 (Leighton Buzzard Road)**

The Transport Plan contained in the DLP is incomplete, and I have serious concerns about an increase in traffic through Potten End. Tring is projected to grow by 55%, and Berkhamsted by 25%. There is also a major development to the north of Hemel, called the "Hemel Garden Communities", which will comprise 1,550 homes built over the next 17 years, and a further 4,000 afterwards. Also envisioned is a potential new link road from J8 on the M1 through the new garden community to the B440 (Leighton Buzzard Road). A reference is also made to this new link road being utilised by Tring and Berkhamsted residents to access the M1. However, there is no consideration at all given to how those residents get to the B440 in the first place. The obvious answer is via Potten End. This will lead to a considerable increase in traffic through the lanes of the village, not only because of the substantial growth of the adjoining settlements, but also because the changes in the Hemel Hempstead road layout will make it harder to access the A414/M1 through Hemel (reduction of lanes on the A414). This will funnel even more traffic onto cross-country lanes. This is particularly the case for HGV vehicles which are prohibited from coming from the north via Water End Lane and from the south through Warners End (via Galley Hill) – in both cases because of weight restrictions on the relevant roads. Potten End has seen a noticeable increase in this type of traffic over the past few years since those restrictions have come into force.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8169

**Person ID** 1264266

**Full Name** Carolyn Nicholls

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I am very concerned about the large number of new houses to be built over the next decade and a half. Green belt land and agricultural land will be used which will not be good for climate change or for the local community in Hemel, and the local boundaries between settlements will be blurred.</p> <p>But my major concern is the water supply. We have no reservoirs here - how can we accommodate so many new houses? Does the government think of this when setting building targets? We are already taking too much water from the underground aquifers and from the River Gade which runs dry in its upper reaches in a hot summer.</p> <p>Taking excessive water from the aquifers lowers the water table and reduces the amount of water in the river, which is a unique and valuable chalk stream.</p> <p>Please do not commence this vast housing build until you have established a way in which we can supply sufficient water.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8183
<b>Person ID</b>	1266123
<b>Full Name</b>	Elizabeth Morris
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	(Lack) of water availability and sewage enhancement. One struggles with a proposal of an enormous housebuilding programme without any notion of changes to the water supply or sewage capability in a town that already has shortages and failure. Add to it the Government's desire to 'be green'. Sucking water out of the Bulbourne would result in a decimation of wildlife and a green facility that is enjoyed by many.

Lack of GP Facilities. Won't even go into the tragedy that is West Herts NHS but will ask how can such housebuilding growth even be considered with the knowledge that Berkhamsted is bereft of enough GP facilities? The recent amalgamation for a few Berkhamsted practices with a Tring practice was secured just before 1 if not 2 GP Berkhamsted practices actually thought they would have to close their doors forever. This plan has no indication of additional GP or dental resource for another 10,000.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8203

**Person ID** 1266150

**Full Name** Michela Capozzi

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

Generally, I have very serious concerns about the additional demand for water this volume of new homes will bring to the whole of the Dacorum area. This area is already a drought risk and whilst the water companies are legally obliged to provide water where developments are approved that doesn't mean the water is there to be had. Natural water courses and aquifers are already under strain and the environment will not be able to support more demand. As with other infrastructure issues, the Plan has no detail about this and DBC would look to approve a Plan that has no thought to the environmental consequences.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8212

**Person ID** 1158423

**Full Name** Richard Frankel

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>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.</p> <p>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. Additionally, 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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8220
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10): 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
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8249
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Insufficient infrastructure to sustain high growth numbers</b></p> <p>The draft Infrastructure Development Plan (IDP) is woefully underdeveloped, which is very concerning given the 25% increased growth.</p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan as proposed does little to address the improvements in infrastructure required to support the proposed increase in housing. In particular, there are concerns regarding the impact on water supply and waste-water disposal. The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020's under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer, despite it already assessed as being "over-abstracted".</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8255
<b>Person ID</b>	1265003
<b>Full Name</b>	Martin Bishopp
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	1 The massive increase in the house building would severely impact the infrastructure of the area. This is not addressed in the plan, provision to accommodate all this extra housing and increase in population it's not there. There is not enough water in the local area to supply this extra population. Additional water would need to be extracted from the chalk aquifer which which would damage local chalk rivers. These are priority habitats.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8256
<b>Person ID</b>	1266157
<b>Full Name</b>	Samantha Bishopp
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	1 The massive increase in the house building would severely impact the infrastructure of the area. This is not addressed in the plan, provision to accommodate all this extra housing and increase in population it's not there. There is not enough water in the local area to supply this extra population. Additional water would need to be extracted from the chalk aquifer which which would damage local chalk rivers. These are priority habitats.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8269
<b>Person ID</b>	1266165
<b>Full Name</b>	Nicky Kaleniuk
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I have lived in Apsley for 16 years and in that time I have seen a lot of changes, and a loss to a lot of green areas surrounding the village.</p> <p>The local plans for the area, and of boxmoor do nothing to alleviate my worries about this, and fills me with dread!</p> <p>The roads around apsley and boxmoor are gridlocked a lot of the time, there are school place shortages and mite and more of the green spaces are being built on.</p> <p>The proposals to build up to 8 storey buildings around the Boxmoor trust area near the station will seriously damage the look and feel of the place, and will have a detrimental affect on the traffic congestion, air quality and noise pollution spoiling an area of outstanding beauty enjoyed by all of the local residents.</p> <p>The housing that is being built at the moment in these areas is too expensive for most local residents and attracts more and more people moving out of London which does not then help the young people in our town who are on housing lists and need properties to rent.</p> <p>There are not enough school places for all of the children on the new Aspen park estate as it is, meaning that children have to get in card to travel to school exacerbating the problem of local traffic at peak times.</p> <p>Soon I fear that there will not be anywhere for us to walk our dogs without getting in a car to drive to places instead of being able to walk from our houses as all of the green spaces are disappearing.</p> <p>Please consider residents views and stop the overdevelopment of this wonderful area.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8274
<b>Person ID</b>	1266166
<b>Full Name</b>	Martin Scicluna
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I have lived in Potten End for over 28 years and I wish to register my concern about the above plan.</p> <p>Potten End suffers regular electrical power cuts because of a substation which is not fit for purpose; it's water pressure is poor, I've had Affinity Water confirm it is at the lowest level acceptable to the Regulator; it's roads especially Hempstead Lane are too narrow to cope the current traffic.</p> <p>So, additional housing in the area will exacerbate the problems suffered by Potten End residents.</p> <p>Berkhamsted traffic is often, pre lockdown, at a complete stop as the roads can't cope with the volume - the inconvenience and inefficiencies suffered by the residents of the town and surrounding areas will multiply if additional housing is built as proposed.</p> <p>I trust that these and similar views are taken into account and that the Plan is rejected.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8327
<b>Person ID</b>	1266176
<b>Full Name</b>	Francesca Ryde
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I write to you regarding the Proposed Development in Long Marston for over 3,000 houses.</p> <p>Have you thought about the local infrastructure? The small country lanes already smothered in pot-holes, large vehicles ruining verges, encroaching on the ditches (to MINIMISE FLOODING), destroying wildlife? What about the farms already there, for hundreds of years, actually sitting on FLOOD PLAINS? What about the schools, the doctors surgery's, the already at capacity local hospitals and tiny train stations barely able to meet current capacity? The list could go on, but I am aware we are VERY SHORT OF TIME.</p>

Quite frankly this is ridiculous and has not been diligently thought through. As for the timeframe of LESS THAN A WEEK for objections to be raised and informing the landowners; it is an utter disgrace. You may have pressures from higher powers but seriously, have you not thought beyond that? You clearly have no heart for the people you are supposed to look over. Livelihoods will be lost, generations of farming destroyed, wildlife killed, local workforce's crippled, current locals needs disregarded, all for you to 'meet targets'. Good luck when the rain comes is all I can add. We live on clay! I urge you to reconsider your planning and your ultimatum timeframe. Have a heart.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8385

**Person ID** 399112

**Full Name** Mrs Sally Smith

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

INFRASTRUCTURE

This is a huge potential problem for the both the Dacorum community and Council Services alike. Over the years I have seen the population of Berkhamsted increase dramatically with new estates, infill projects etc with the following consequences:

- . Severe congestion in the town with the associated degradation in air quality.
- . Overcrowded doctors surgeries and lack of resource for social/ mental healthcare for many who do not have the financial resources to use private facilities
- . Overcrowded schools with parents having to fight for places for their children in schools that can provide them with competent education for the future.
- . Severe pressure of utilities especially water which we have seen in recent years ,even with the existing population levels , become a problem.
- . Increases in noise, poor air quality ,litter and for some, anti- social behaviour.

The proposed development will have a major impact on the quality and pleasure of living and visiting the area. It has to be scaled back and supported with immediate commensurate infrastructure enhancements. Our local politicians have to deliver an unequivocal message to Central Government that Dacorum cannot and will not be able to deliver reasonable, good quality, sustainable growth without the upfront infrastructure development in place from day one. Failure to do this will result in intense frustration for all the residents of Dacorum and will be reflected in future voting decisions.

In conclusion I have no fundamental objection to reasonable additional housing, especially affordable, for those that need it. However any development has to be a programme that reflects the local communities immediate and longer term needs whilst maintaining quality lifestyles for all and not a housing numbers game.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8439

**Person ID** 1266251

**Full Name** ANTHONY TYRER

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

Infrastructure

Its is unclear what "amount" of open space will actually be available as part of these plans. In addition the existing infrastructure such as GP surgeries are at present unable to cope with their current patient lists - 2 week wait for a telephone appointment is the norm at Gossom End Surgery, this is before the addition of any new homes.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8469

**Person ID** 495878

**Full Name** Ms Anna Hanson

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy 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>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8479
<b>Person ID</b>	1266302
<b>Full Name</b>	Gareth Garner
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. The only solution would be to extract additional water from the chalk aquifer causing further

damage to the local chalk streams. Chilterns has 9 of the chalk stream habitats and the siting of housing will intern degrade these special places.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8546

**Person ID** 211354

**Full Name** Mrs Laura Sanderson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

Water and sewerage. We know that both of these are already overstretched. The rivers cannot sustain any further abstraction. There have been sewerage overflows in recent years. In Devon 1970s there was a moratorium on housing until the water and sewerage supply problems had been addressed. DBC should do this now in the interests of its current residents.

Road systems. The Plan acknowledges that they are already inadequate for the present population. The A41 was built for a fraction of the traffic that now uses it and would require at a minimum, extensive improvement to its slip roads. NO mention of tis is made in the Plan or how it is to be financed. The town centres are clogged. No part of the plan addresses public transport infrastructure, where it will run or how it will be paid for. No part of the plan addresses the air quality in the centres of the towns affected.

Schools. The need for these is driven essentially by the impossible housing target accepted by DBC.

Healthcare. Rather than pressing for the re-opening of Hemel Hempstead hospital, which was designed with the possibility of expansion, the Plan envisages building on that site. That would be acceptable if another hospital was being built in the centre of the West Herts area as proposed by the Hospital Action Group.

DBC could be putting its weight behind these proposals in the interests of its constituents. Instead it ignores the need to provide adequate healthcare within the Borough.

There should be another moratorium on further housing until healthcare provision is at least as good as the National Average.

**Included files**

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8565
<b>Person ID</b>	1266565
<b>Full Name</b>	ANNE WERBICKI
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The DLP makes little mention of how, if at all, the existing road infrastructure is going to deal with the inevitably much higher traffic which will be produced by construction and ultimate use. Where Dacorum cannot keep up with current pressures as to road use, road surface conditions and the litter and debris problem prevalent across our urban region, does it think it fair, reasonable and environmentally acceptable to create an even further assault on an already ill cared for infrastructure ?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8573
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8588
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Another serious point to consider is that you do not have enough water to supply all the extra homes proposed and 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. How do you propose to provide water to all these new homes without causing such damage to the chalk rivers? Listen to residents concerns about your plans to build a ridiculous number of homes and the massive impact it will have in the area and I urge you to reconsider your proposal .
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8598
<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> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	- I could find no reference to the need to uplift the funding for facilities support provided to areas. For instance, HCC is currently unable to support the current road network and this level of development will exacerbate the problem.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8678
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><u>Transport</u>. The county council will welcome the inclusion of a transport paragraph to the supporting text within this section and/or even within <i>Policy SP6: Delivering the Retail and Leisure Strategy</i>. High levels of accessibility and high-quality public places are key to commercial centres, and transport plays a major role in both of those factors.</p> <p><b>Paragraph 10.3</b></p> <p><u>Lead Local Flood Authority</u>. It is considered that “<i>flood defences</i>” is a better term than “<i>flood prevention</i>” as flooding cannot be prevented in all circumstances. The text within the paragraph should be changed as follows. It is assumed that the term drainage also covers foul sewers as well as surface water provision.</p> <p><i>utilities and flood management infrastructure – water supply and treatment, flood prevention defences and drainage, waste disposal and energy;</i></p> <p><u>Transport</u>. Rights of way should be added to the list of transport infrastructure in the first bullet point:</p> <p><i>The term infrastructure covers a wide variety of services and facilities provided by private and public bodies and includes:</i></p>

#### **Paragraph 10.4**

Transport. The main focus of interventions will need to be on improving sustainable modes of transport such as walking and cycling within and between towns and villages which will create the potential for a significant modal shift away from the private car use towards sustainable modes of transport in accordance with the policies in HCC's With this in mind, HCC would only support a new transport corridor to the north of Hemel Hempstead through the North and East Growth Areas if it is for the use of sustainable modes of transport only, as such the third bullet point needs to be reworded accordingly to reflect this.

#### **Paragraph 10.8**

It is noted that the LPA's precise mechanism for securing infrastructure within the borough is being reviewed, particularly in the light of the publication of the draft White Paper titled: Planning for the Future' last summer. HCC recognises that Dacorum has been using the CIL mechanism for collecting contributions since July 2015 and whilst the county council has encouraged LPAs to adopt CIL within their respective authority areas, HCC considers that CIL rates within the county are set too low when compared to potential Section 106 contributions that could be obtained from similar scales of

This was raised by the county council in our response to the White Paper consultation last year. The consultation paper also contained a proposal to replace CIL and the use of Section 106 agreements by an all-encompassing Infrastructure Levy (IL). Whilst this could simplify the situation in Hertfordshire, as not all LPAs have adopted CIL, the white paper appeared to imply that a mandatory, nationally-set rate based on a proportion of the development value above a certain threshold on developments may be This may mean that an IL would not be payable if those developments do not meet the minimum threshold and furthermore, an IL would only be payable on the proportion of the value that exceeds the minimum threshold.

*Whilst the county council appreciates (and it is assumed that the LPA does too) that the proposals surrounding IL are not yet fully developed, a number of other concerns were raised by HCC with regard to the functionality of IL, particularly surrounding the timing of when IL will be received by infrastructure bodies and the potential for adding affordable housing, which could further reduce funding available for infrastructure.*

The county council notes that the LPA intends to produce a supplementary planning document (SPD) on securing developer contributions. You will be aware that the county council is currently reviewing the adopted 2008 developer guidance toolkit for Hertfordshire with a Guide to Developer Infrastructure Contributions which provides an updated approach and overview of obligations which may be sought as part of the planning process. A draft has been shared with the LPA and other LPAs within the county and it is anticipated that it will be presented to the county council's Cabinet Panel this coming spring. Subject to further proposals being developed for a possible nationwide IL, HCC will welcome engagement with the LPA during the preparation of this SPD in due

#### **Policy SP7: Delivering Infrastructure**

The county council broadly supports the requirements that are outlined in this However, the county council does not support the deferral of developer contributions as suggested section 4, paragraph b) of Policy SP7, as payments at a later stage e.g. at completion, could result in infrastructure delivery agents (which include a number of public sector

bodies such as HCC) being faced with cash flow issues, in order to ensure infrastructure is in place in a timely fashion. This may include borrowing which places an unnecessary financial risk on the public sector.

The county council will only be prepared to support such an approach where deferred payments do not impact upon project delivery timeframes; for example, phasing payments that align with a project delivery Suggested changes to the text in Section 3 and Section 4, paragraph b) are therefore as follows:

- 1 *The timing of the provision of the infrastructure should be linked directly to the phasing of the development, with a masterplan where on site provision is required, to ensure that infrastructure is provided in a timely and comprehensive manner to support new development.*

*b. use an appropriate mechanism to defer part of the developer contributions requirement to a later date, only where phased payments align with a project delivery milestone.*

Lead Local Flood Authority. Paragraphs 2 and 3 in policy SP7, are especially relevant to surface water drainage arrangements in large development areas where more than one developer is active. A strategic SuDS serving several developments may be the most appropriate solution and has implications for combined contributions and phasing of construction.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS8698

**Person ID** 1266706

**Full Name** Ms Jane Murray

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Delivering Infrastructure to Support Growth Strategy comment** 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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8700
<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>Delivering Infrastructure to Support Growth Strategy comment</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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8719
<b>Person ID</b>	1266741
<b>Full Name</b>	stephen 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>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8785
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8792
<b>Person ID</b>	1261814
<b>Full Name</b>	Liz Uttley
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>SP7 – It is good to see the requirement for loss or damage of social, economic and environmental assets to be made good by developers, how this will be measured needs to be agreed. It is worth noting however, that viability assessments are often used by developers to justify not building affordable homes and meeting other responsibilities. In recent years, large builders have been making record profits (in 2018 Bovis' profits increased by 47%). This suggests quite strongly that the viability assessments used are not entirely accurate to date, and overestimate some of the costs to developers. Whilst I understand that councils will review these viability assessments, perhaps it is time for a more rigorous review system, carried out by an independent body.</p> <p>SP7 4a. This clause implies that under problems with viability, critical infrastructure will win funding over 'required' infrastructure, which is understandable, but misses the fact that 'critical' infrastructure is often for cars, and most 'required' infrastructure is for cycles and pedestrians. This is contrary to the requirement for pedestrians, buses and bikes to be prioritised over cars.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS8871
<b>Person ID</b>	1266814
<b>Full Name</b>	Eric Juster
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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

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.

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.

Green belt land 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 that many 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.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9072
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	3) No evidence of required infrastructure to support these numbers. I have struggled to get doctors and dentist appointments whilst I have lived in Berkhamsted, and have needed to travel to St Albans for any non-routine requirement. I've also had to travel to St Albans for Jury service, for which there is no reasonable public transport alternative. The area has a very good reputation for its schools, but they are over subscribed, and my commute to work is greatly affected by the large number of people from outside the town who bring their children into Bridgewater and other schools via private transport each day. Our police presence is so low that the town council has needed to step in and fund an

additional officer to support the constabulary, and crime has severely escalated since COVID lockdowns. Adding more population before putting an acceptable infrastructure development plan in place will aggravate these problems.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9073

**Person ID** 1267067

**Full Name** KATHRYN BROWN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** Delivering Infrastructure to Support Growth: there is no evidence of adequate attention to issues of water, waste-water and traffic. If this is not addressed early then the infrastructure will be well behind the actual housing developments.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9096

**Person ID** 1267074

**Full Name** Joanne Howe

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9110
<b>Person ID</b>	1174481
<b>Full Name</b>	Mr & Mrs Ostle
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The number of dwellings must also take into account of local infrastructure, including the fact that Berkhamsted lies in a steep sided valley which despite the bypass already has severe congestion and correspondingly unnecessarily high levels of pollution at many times of the day.</p> <p>Congestion and pollution; See above</p> <p>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.</p> <p>Schooling; For some years the existing schools have already been operating at their full compliments. Under other contemporary plans the proposal to build a new school at Darrs Lane seems not to recognise the reality of distance, road safety, potentially even further congestion. We have a particular concern about children having to walk a long distance on mediocre pavements alongside a very busy road. Many children would also have to somehow safely cross the road, and although local arrangements such as further lights and crossings could be installed, this would further cause congestion and pollution. The overall pollution issue is even more important to the younger group, namely children, who would be adjacent to the traffic.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9125
<b>Person ID</b>	399320
<b>Full Name</b>	Mr Simon Jackson
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>In your strategy report you clearly state you are” not responsible for the provision of most infrastructure” ! This is worrying. I believe the message for Central Government should be that Dacorum CANNOT and will NOT be able to deliver reasonable, good quality , sustainable growth without the upfront infrastructure development in place from day one. Failure to do this will result in frustration on behalf of all the residents of Dacorum and this could be reflected in political voting for sure.It will also have major impact on the quality and pleasure of living and visiting the area.</p> <p>We do want another scenario such as the developments in Aylesbury and Bicester.!</p> <p>In conclusion I have no real objection to additional housing, especially affordable, for those that need it but this cannot and should not be a “ Government numbers game” but programme that reflects the local communities immediate and longer term needs whilst maintaining quality lifestyles for all.</p> <p>I hope you will include my concerns in your consultation and this will result in a positive result for the future</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9152
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Water and sewerage. We know that both of these are already overstretched. The rivers cannot sustain any further abstraction. There have been sewerage overflows in recent years. In 1970s Devon there was a moratorium on housing until the water and sewerage supply problems had been addressed. DBC should do this now in the interests of its current residents.</p> <p>Road systems. The Plan acknowledges that they are already inadequate for the present population. The A41 was built for a fraction of the traffic that now uses it and would require - as a minimum - extensive improvement to its slip roads. NO mention of this is made in the Plan or how it is to be financed. The town centres are clogged. No part of the plan addresses public transport infrastructure, where it will run or how it will be paid for. No part of the plan addresses the air quality in the centres of the towns affected.</p> <p>Schools. The need for these is driven essentially by the impossible housing target accepted by DBC.</p> <p>Healthcare. In West Herts the healthcare provided is already below the National Average. It's a disgrace. Rather than pressing for the re-opening of Hemel Hempstead hospital, which was designed with the possibility of expansion, the Plan envisages building on that site. That would be acceptable if another hospital was being built in the centre of the West Herts area as proposed by the Hospital Action Group.</p> <p>DBC could be putting its weight behind these proposals in the interests of its constituents. Instead it ignores the need to provide adequate healthcare within the Borough.</p>

There should be another moratorium on further housing until healthcare provision is at least as good as the National Average.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9234

**Person ID** 1264686

**Full Name** Suzanne Doubleday

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** 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.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9287

**Person ID** 1267333

**Full Name** JO MURPHY

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9303
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9319
<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>Delivering Infrastructure to Support Growth Strategy comment</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 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).</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9412
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9431
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<b>Water &amp; waste water infrastructure concerns</b>  The waste water provisions are already stretched beyond capacity and further growth is a real threat to our waterways. Berkhamsted Sewage Treatment works are at present insufficient to deal with the current level of population in the area, as evidenced by the discharge to the canal which damages the local ecosystem, including killing wildlife. I see no proposal for an increase in capacity of local sewage works, which is unacceptable. Couple this with the River Bulbourne running

dry in the summer of 2020, due to abstraction to serve our current population, adding an additional 3,000 homes to the local area will have an unmitigated impact on the local environment.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9494

**Person ID** 1267419

**Full Name** Eric White

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** The document has woefully inadequate plans to develop local infrastructure, with alternative transport and pedestrian access issues barely considered (and, where they are, largely focused on regenerating routes that the council has allowed to fall into disrepair), while sacrificing irreplaceable greenbelt land and contributing to avoidable sprawl.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9528

**Person ID** 1267427

**Full Name** Megan Humphreys

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9537
<b>Person ID</b>	398872
<b>Full Name</b>	Mrs Jane Barrett
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	I also believe that whatever plan is eventually adopted must specify exactly the order in which land should be released for development to provide a coherent development programme facilitating the provision of local infrastructure such as schools, shops and transport links and of course essential social housing. Developers should not be permitted to acquire develop land across the town on an ad hoc basis.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9556
<b>Person ID</b>	1267439
<b>Full Name</b>	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

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9560
<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>	
Yes / No	
* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Water is in very short supply within this area and with the erosion of the chalk streams we see the River Bulbourne dry in the summer months. More drainage will only add to this issue.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9574
<b>Person ID</b>	1264671
<b>Full Name</b>	Mr and Mrs Dan Harris
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Following a review of the Dacorum development plan to 2038 and being residents in Tring, we're concerned with the proposed plans to increase housing by 55% in Tring. Particularly when it appears there's little provision to expanding / improving infrastructure that exists today. Our objections are as follows:</p> <ul style="list-style-type: none"> <li>• Doctors &amp; Hospitals: It's unclear as to the provision for these services with such a significant increase. I'm not sure Stoke Mandeville could cope as it stands today with the increase in housing across Aylesbury and Tring.</li> <li>• A41: Already very stretched at rush hour times. This road will see a significant increase in usage when you review the other plans in place across Dacorum and Aylesbury Vale. I understand there are plans to have thousands of homes at the top of the A41. There will need to be a change to this road.</li> <li>• Linked to the above Train station comments - it's not clear how the provision for additional road users is being considered along Station Road or Northfield Road (from Pitstone) as it stands today these roads are already very busy particularly during peak hours.</li> <li>• The High Street today is already very busy from a traffic perspective made even worse with large vehicles and buses. An additional 3000+ homes in Tring without a clear plan for the high street doesn't work.</li> <li>• Train station: the parking provision at the station is already stretched. Prior to COVID-19 it was usually difficult to find a car parking space after 8:30. People are then left to park their cars wherever they can find space sometimes at the danger to pedestrians and other road users. There will need to be extensive changes to the parking provision at the train station. This is not mentioned in the plan.</li> <li>• Infrastructure:</li> <li>• A large proportion of the housing is planned to be in the fields behind grove road. Whilst I'm aligned that it may be a good location for additional housing, the volume of proposed houses is significant. This is a cause for concern with regards to traffic, firstly on Station Road but also down Grove Road and surrounding areas</li> <li>• On initial review of the plans, not all are in keeping with a traditional market town - Any approved plans must remain in keeping with the current town.</li> </ul> <p>We are not opposed to additional housing however, the proposed increased housing as it stands today is extremely excessive considering the lack of additional infrastructure. It is also clear that Tring is proposed to take a disproportionate increase when compared to other local towns.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9580

<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>Delivering Infrastructure to Support Growth Strategy comment</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 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.</li> <li>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.</li> <li>I don't think that one road access to a residential area is wise. I think two ways in and out is safer.</li> <li>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.</li> <li>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.</li> <li>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!</li> </ul>

- 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 kingfishers, 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 site?
- You must add a footpath from Lock Field into Ashridge. So people can walk directly from Lock Field into Ashridge without having to use the foot path on New Road - again, this is too thin and not safe compared with the speed of traffic.
- Everywhere in Berkhamsted and Northchurch there are parking issues. Please can you design the new residential area to cope with the amount of vehicles. For example, plan houses to have ample driveways and garages for residents and guests. And double yellow the surrounding roads to STOP people from parking on footpaths. This is not safe for children. Again, if making safe footpaths means building 40 houses rather than 60 - then do it. Make this estate so that bin lorries and fire engines can EASILY drive everywhere (whilst keeping their bin collectors safe!)
- What about social responsibility? Is this new estate designed for middle and upper-class people? Or is it for everyone? Even working class? Are you mixing social housing between the large detached houses?
- How are you planning to future-proof this estate? Are you planning footpaths to be wide enough for two wheel chairs to pass each other safely? This would also be a safer width of path in case there is another pandemic and people have to keep 2 meters away from each other. Are you adding cycle paths? I think if you are serious about the environment then you should include cycle paths EVERYWHERE - even on New Road and the High Street. Even if cycling does not prove to be popular - you are future-proofing this space for things such as hovercrafts or the food-delivery-robots that you see even today in Milton Keynes. Everywhere footpath in Berkhamsted FAILS for safety. Lets make this new estate safe.
- Repair local roads after development. As seen on the new estates up Durrants Lane - the amount of construction traffic (and its pollution) has ruined the roads. Will you repair and redevelop the roads after this estate has been built?

- All of these new houses (both in Berkhamsted, Northchurch, Tring etc) will create a LOT more traffic on the road. How do you plan to future develop the T-junction next to St Marys School between New Road and the High Street? There is no safe crossing for children over New Road AT ALL! And it is next to a school!!!
- You MUST develop the infrastructure. How will you develop the Tesco shop parade and parking to deal with greater numbers? How will you develop local doctors and dentists to deal with greater numbers? Which hospitals are due to take on these greater numbers of people and how are you contributing to their development too?

To summarize; I know that growth is inevitable. But you MUST do it WELL and RESPONSIBLY, for the future of our area, our children and our wildlife.

I'm more than happy to talk to someone or detail my thoughts further. I'm happy to provide photographs of cars parked on pathways everywhere, videos of cars nearly hitting myself and my children walking to school etc etc.

If you build this Lock Field estate then do it WELL. Be innovators, be planet-protectors, be an inspiration to other areas who seek to grow too.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9601

**Person ID** 1263214

**Full Name** Mr R Pope

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

- The population continues to increase while services are decreasing. We have witnessed the loss of police stations in Tring, Berkhamsted and Hemel (we have currently nowhere to actually see a police officer face to face), our local Court House has gone, many doctors surgeries have been amalgamated, centralised and no longer located in local neighbourhoods. You granted permission to build a multi-story car park behind Waitrose in Berkhamsted providing additional commuter car parking for numerous London bound workers from Buckinghamshire and beyond.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS9602
<b>Person ID</b>	1267455
<b>Full Name</b>	Ms C Wilby
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<ul style="list-style-type: none"> <li>The population continues to increase while services are decreasing. We have witnessed the loss of police stations in Tring, Berkhamsted and Hemel (we have currently nowhere to actually see a police officer face to face), our local Court House has gone, many doctors surgeries have been amalgamated, centralised and no longer located in local neighbourhoods. You granted permission to build a multi-story car park behind Waitrose in Berkhamsted providing additional commuter car parking for numerous London bound workers from Buckinghamshire and beyond.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9620
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) <u>Delivering Infrastructure to support growth</u> – 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.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9634
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9672
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<b>Chapter 10</b> refers to infrastructure requirements and the treatment of this significant area is inadequate. Dacorum's Growth and Infrastructure Strategy to 2050 makes no mention of the critical issues around water supply or those relating to waste-water and sewage treatment. The Infrastructure Development Plan 2020 references the issues of sewage treatment and wastewater transport but, as since 2018, work required as the result of new development is to be carried out by the relevant statutory water undertaking, the Water Cycle Study Scoping Study (evidence for the Emerging Strategy) is out of date and needs revising urgently.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9693
<b>Person ID</b>	1267471
<b>Full Name</b>	Richard Evans
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Impact on infrastructure</b></p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all 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. We have particular concerns regarding the impact on water supply and waste water disposal.</p> <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>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9694
<b>Person ID</b>	1267472
<b>Full Name</b>	Debbie Hawkins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Impact on infrastructure</b></p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all 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. We have particular concerns regarding the impact on water supply and waste water disposal.</p> <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>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9718
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9756
<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>Delivering Infrastructure to Support Growth Strategy comment</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** Delivering the Infrastructure to Support Growth

**ID** EGS9771

**Person ID** 1267525

**Full Name** Anil Mistry

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

**1 Other important points to address**

Other important points that should be addressed in the revised Local Plan are:

**Impact on infrastructure**

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.

Specifically:

- The transport study must take into account of Berkhamsted's geography and valley setting. Most building is proposed along the top of the valley.

- Significant proposals should be made for improvements to roads or traffic flow. All additional traffic created will feed on to Shootersway, Kings Road to town/station, and various rat-runs to avoid inevitable congestion.
- Proposals must be made to improve walking/cycling/public transport routes.
- Significant improvements should be described for public open spaces (apart from garden-sized suggestions only.)
- The 'wildlife corridors' must be more than a narrow strip along the A41, and must connect with meaningful habitats (e.g. tunnels for wildlife to go under A41 to access further green/habitat areas.)
- Additional health services must be provisioned. The new surgery at Gossoms End is will not be able to cope with ALL the new developments. At present, only a minor extension of Manor Street is proposed.

#### **Water supply and waste water disposal**

The current Local Plan relies on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. The revised Local Plan must make it clear what impact the development proposals will have on this, as well as sewage – especially if after review there is still a greater number of housing suggested.

The level of new housing currently proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030.

The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

#### **Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9784

**Person ID** 1267530

**Full Name** Susan Lambiase

#### **Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>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.</p> <p>There'll be a enormous detrimental impact :</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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9808
<b>Person ID</b>	1263842
<b>Full Name</b>	Karen 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Insufficient infrastructure to sustain high growth numbers</p> <p>The draft Infrastructure Development Plan (IDP) is woefully underdeveloped, which is very concerning given the 25% increased growth.</p>

The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan as proposed does little to address the improvements in infrastructure required to support the proposed increase in housing. In particular, there are concerns regarding the impact on water supply and waste-water disposal. The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020's under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer, despite it already assessed as being "over-abstracted".

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS9875

**Person ID** 1267757

**Full Name** SIMON SMITH

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

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.

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).

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.

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.

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.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9909
<b>Person ID</b>	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
* <b>Yes</b>	
* <b>No</b>	

**Delivering Infrastructure  
to Support Growth  
Strategy 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 townsfolk 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** Delivering the Infrastructure to Support Growth

**ID** EGS9924

**Person ID** 1267774

**Full Name** AATMA SEESURRUN

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Delivering Infrastructure to Support Growth Strategy comment** 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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.

**Included files**

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9949
<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 * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy 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. 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.</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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9954
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9983
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS9997
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The document has woefully inadequate plans to develop local infrastructure, with alternative transport and pedestrian access issues barely considered (and, where they are, largely focused on regenerating routes that the council has allowed to fall into disrepair), while sacrificing irreplaceable greenbelt land and contributing to avoidable sprawl.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10003
<b>Person ID</b>	1267856
<b>Full Name</b>	HOLLY 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>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS10036
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Infrastructure.</p> <p>Berkhamsted has limited opportunity for facilities. Planning consent has already been granted for substantial housebuilding in the town, and this can only increase demand for schooling, medical services, dentists, etc. Because Berkhamsted has a linear centre, there is no obvious location for increased facilities, and it is much more sensible to place the housing where there is already infrastructure in place-i.e. Hemel Hempstead, which has a hospital, local bus services for those without cars, plus a choice of schools and capacity in the town centre for additional facilities.</p> <p>By way of example, Ashlyns School is full, and housing should be located where children can reach a local school without a long journey and without relying on parents to provide the transport.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10050
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10063
<b>Person ID</b>	489014
<b>Full Name</b>	Mrs Carole Lewis
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	We do not have a reservoir for our water needs, so water is drawn from our water courses. In 2019 the River Gade ran dry, and the proposed number of dwellings will increase pressure on this water supply by 28%.  With many other of my fellow residents I am deeply concerned already about pressure on our GPs, schools, police and road network. The fact that we do not have an easily accessible Hospital also worries me. Getting a GP appointment is already quite frankly a nightmare and I can hardly bear to mention the dreaded Watford hospital problems.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10098
<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>Delivering Infrastructure to Support Growth Strategy comment</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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10199
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	I am extremely concerned about infrastructure – and especially highways. Hemel Hempstead is already very congested in key pinch points and “minor tinkering” at the odd junction will not solve the problem.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10213
<b>Person ID</b>	1268163

<b>Full Name</b>	RONA GIBSON
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I am writing to you to make some points regards the Dacorum Local Plan 2020 to 2038</p> <ol style="list-style-type: none"> <li>1 I know that the deadline has already been extended for the consultation. However I feel in the current circumstances when the population is in the midst of a third lockdown that not everyone's thoughts have been able to focus on this Dacorum Local Plan. Hence I would like to propose that the deadline is extended again.</li>   <li>1 Some of my concerns</li>   <li>1 a) From 23.120 " There are few opportunities for new road capacity in the town. The careful location of new development and promoting opportunities for sustainable travel, will in part help tackle a number of parking and traffic issues. "</li>   <p>The main artery from the A41 in to Berkhamsted - Kings Road A416 - is a narrow road and is already extremely busy during peak times and this will become more congested. Shootersway will be affected greatly by the increase in traffic as a result of the large development in the area.</p>   <li>1 b) Please can you detail if there are now any further proposals for waste management ... "The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required." From Draft Infrastructure Delivery Plan Appendix B - Berkhamsted Schedule.</li> </ol>

1 c) This is near an Area of Outstanding Beauty and I do wish reassurance or some explanation that this will continue to be so for future generations to enjoy and relax in.  
The increase in population could have an enormous effect on the Ashridge Estate.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10225
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10235
<b>Person ID</b>	1268174
<b>Full Name</b>	ELIZABETH ROLLINSON
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>1 Impact on infrastructure</p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all 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. We have particular concerns regarding the impact on water supply and waste water disposal.</p> <p>1 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. The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10240
<b>Person ID</b>	1268177
<b>Full Name</b>	DAVID ROLLINSON
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>. Impact on infrastructure</p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan as proposed does little to address the improvements</p>

in infrastructure required to support the proposed increase in housing. We have particular concerns regarding the impact on water supply and waste water disposal.

1 Water supply and waste water disposal

The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030. The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS10371

**Person ID** 493957

**Full Name** Mrs Anne Galewski

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

The ongoing arguments about hospital availability has been resolved only by a proposed rebuild of Watford General, speaking from experience, trying to get to Watford quickly is impossible how much worse when dealing with these additional numbers? Doctors surgeries are under pressure in Berkhamsted, numbers increasing in the remaining 3 as 2 have closed, with one new premises, at Gossoms End which has only 6 patient parking spaces. This is billed as the new surgery to absorb the thousands of new patients, how can this work? it is woefully inadequate.

The Local Plan acknowledges a lack of school places and there are proposals for new secondary and primary schools, Ashlyns in Berkhamsted is full, how quickly can they be built?

The responsibility for education lies with Herts county council, so there is no guarantee of the schools suggested being built.

Water supply is a problem in the borough, and extraction from the chalk streams is supposed to be being curtailed, where does this extra supply come from? DBC are lacking an explanation of how they will deal with water supply, drainage and sewage with increases in population.

Rush hour when the schools are open puts pressure on our roads which are becoming ever busier, and parking in the towns is often roadside and on pavements due to lack of parking spaces and 2/3 car households. The idea that Darrs Lane, Durrants Lane and Shootersway in Berkhamsted and Northchurch can serve the number of houses proposed is absurd. Air pollution is borderline, and close to being illegal already, especially in Northchurch where additional monitoring has been carried out over several years. DBC are using out of date Air Quality Action Plan from 2014-2018 and this should be re appraised.

Public transport is very limited, buses do not serve Shootersway or the other areas of development along Darrs Lane, it is confined to the High Street valley bottom, and the station is nearly 2 miles up/down hill from most of the build. Hence there will be a huge increase in private vehicular movements.

All required new infrastructure needs to be planned and provision for it made at the same time as target chasing on housing build. Developers should be made to pay for and provide all required infrastructure at the same time as building houses.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10397
<b>Person ID</b>	1264613
<b>Full Name</b>	Susan Kane
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>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.</p> <p>I do appreciate that more housing is needed but it should not increase by this percentage in any area.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10400
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10453
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Insufficient commitment is made in The Local Plan with regards to both water supply and sewage. Firm commitments should be made that sewage never goes into local rivers and that the valuable and protected aquifers in Hemel will not be further depleted. The water must be obtained from outside the catchment areas of the Bulbourne, Gade, and Ver.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10475
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>1 Failure to Provide Adequate Supportive Infrastructure</b></p> <p>I feel strongly that the town is already over-developed, with current residents struggling to get doctor's appointments and schools bursting at their seams.</p> <p>I worked at Ashlyns School for 10 years until 2017. Recently they increased their pupil admissions number from 210 to 240 per year. Despite this, I am aware that children from as near as Northchurch were offered school places in Hemel Hempstead and Tring, rather than Berkhamsted in the last two years. Adding an additional third again to the number of people in the town, which is what would happen with the current plan, means that there will be the need for another secondary school and several more primary schools, plus additional doctor's surgeries and dental practices – the local plan does not make provision for this. This means that children will have to be ferried out of the area to other schools, assuming there are spaces, which will inevitably mean more cars and more pollution. The town has already grown substantially over the last few years, with the large development at the top of Durrants Lane nearing completion and along the High Street by the Old Mill, plus lots of infill. This has already put an extra strain on the resources of this small market town.</p> <p>Thank you for your consideration of my views and I hope that actual needs will be taken into consideration in protecting the character of our beautiful Market Town and our surrounding countryside.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10590
<b>Person ID</b>	1268723
<b>Full Name</b>	MARGARET HAWKINS
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Impact on infrastructure</p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all 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. We have particular concerns regarding the impact on water supply and waste water disposal.</p> <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>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10673
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Water and sewerage. We know that both of these are already overstretched. The rivers cannot sustain any further abstraction. There have been sewerage overflows in recent years. In Devon 1970s there was a moratorium on housing until the water and sewerage supply problems had been addressed. DCB should do this now in the interests of its current residents.</p> <p>Road systems. The Plan acknowledges that they are already inadequate for the present population. The A41 was built for a fraction of the traffic that now uses it and would require at a minimum, extensive improvement to its slip roads. NO mention of tis is made in the Plan or how it is to be financed. The town centres are clogged. No part of the plan addresses public transport infrastructure, where it will run or how it will be paid for. No part of the plan addresses the air quality in the centres of the towns affected.</p> <p>Schools. The need for these is driven essentially by the impossible housing target accepted by DBC.</p> <p>Healthcare. In West Herts the healthcare provided is already below the National Average. It's a disgrace. Rather than pressing for the re-opening of Hemel Hempstead hospital, which was designed with the possibility of expansion, the Plan envisages building on that site. That would be acceptable if another hospital was being built in the centre of the West Herts area as proposed by the Hospital Action Group.</p> <p>DCB could be putting its weight behind these proposals in the interests of its constituents. Instead it ignores the need to provide adequate healthcare within the Borough.</p> <p>There should be another moratorium on further housing until healthcare provision is at least as good as the National Average.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10695
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<ul style="list-style-type: none"> <li>• The plan is vague on how infrastructure would be delivered</li> <li>• The plan ignores that water extraction from aquifers is already at limit and has no proposals to deal with waste water/sewage disposal which already seems to be at capacity in Berkhamsted</li> <li>• The plan doesn't address how substantially increased traffic flow in Berkhamsted would be managed.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10721
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10736
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10802
<b>Person ID</b>	1268767
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Insufficient infrastructure to sustain high growth numbers</b></p> <p>The draft Infrastructure Development Plan (IDP) is woefully underdeveloped, which is very concerning given the 25% increased growth.</p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan as proposed does little to address the improvements in infrastructure required to support the proposed increase in housing. In particular, there are concerns regarding the impact on water supply and waste-water</p>

disposal. The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020's under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer, despite it already assessed as being "over-abstracted".

Waste-water disposal is an area of particular concern in this area. In Potten End there are several houses that experience sewage backing up into their garden already.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS10812

**Person ID** 1268768

**Full Name** Amanda Stafford

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** 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.

(14)

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS10833

**Person ID** 1268791

**Full Name** ELIZABETH FULLER

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<ul style="list-style-type: none"> <li>• The plan is vague on how infrastructure would be delivered</li> <li>• The plan ignores that water extraction from aquifers is already at limit and has no proposals to deal with waste water/sewage disposal which already seems to be at capacity in Berkhamsted</li> <li>• The plan doesn't address how substantially increased traffic flow in Berkhamsted would be managed.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10864
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>1 Infrastructure – The Dacorum Local Plan is simply addressing the perceived need for housing growth without taking into consideration any infrastructure and services requirement. It simply says that they work closely with other authorities and we do not feel that this is good enough. It has to be a pre-requisite that the infra-structure such as roads, water/waste water supply and broadband together with services such as schools, doctor’s surgeries, dentists and local shops are in place before large housing developments are undertaken. This is particularly relevant for the development in Bovingdon eg over 200 new properties. It is naïve to believe that those 200+ new houses will be built over an 18 year period. Once a development on a single site has commenced they will be built within a short period of time – no developer will build 10 houses per year as it will not be profitable. The infra-structure needs to be put in place before the development of the site commences.</p>
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10884
<b>Person ID</b>	1268804
<b>Full Name</b>	Mr Mark Dixon
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Water supply and waste</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>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10897
<b>Person ID</b>	1268814
<b>Full Name</b>	Ms Emma Cotton
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy 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> <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>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10929
<b>Person ID</b>	1059452
<b>Full Name</b>	Mrs Angela 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>Delivering Infrastructure to Support Growth Strategy comment</b>	I do not believe we need that many houses in this area and absolutely not in green belt, when green belt land is gone it is gone for ever. There is very little if any detail on what extra facilities will be available to support all these houses, schools, doctors surgeries. Another very important factor is utilities, I have family in Leighton Buzzard who have significant issues with water supply due to a very serious lack of planning regarding water. Will we be in the same situation.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS10956
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11033
<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

* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Whilst new schools are proposed in the Council's Plan, I am concerned about whether the proposed health services will be sufficient to meet the needs of new and existing residents. A new surgery is proposed at Gossoms End and a minor extension of the Manor Street surgery. Have you consulted local medical practitioners to determine whether this level of provision will be adequate to cope with the new developments?
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11086
<b>Person ID</b>	1268919
<b>Full Name</b>	Dr Daniel Bishop
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
Yes / No	
* Yes	
* No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<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>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>

*\*NB: The current government's commitment to all-electric vehicle production by 2035 will not manifest in all-electric vehicles on the roads for decades to come.*

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS11373

**Person ID** 1269016

**Full Name** Oliver Galliford

**Organisation Details** Senior Planning Officer  
Hertsmere Borough Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** Details of Dacorum's infrastructure requirements are set out within the Draft Infrastructure and Delivery Plan (IDP), and clearly presented within the delivery strategies and the proposal and sites section. Hertsmere highlights the importance of new high quality infrastructure in ensuring that Dacorum meets its sustainable development objectives. The Local Plan also identifies Sustainable Transport corridors and Hertsmere supports Dacorum's proposals for encouraging modal shift and sustainable travel in accordance with LTP4 principles.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS11381

**Person ID** 1207629

**Full Name** Strategic Planning Department

**Organisation Details** Strategic Planning Department  
Three Rivers District Council

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Policy SP7 – Delivering the Infrastructure to Support Growth: Policy SP7 is supported and it is recognised as particularly important that infrastructure provision is delivered ahead or in conjunction with development in order to avoid placing pressure on existing infrastructure. The requirement for developers to collaborate on infrastructure provision where it is needed to serve more than one site is also welcomed. In regard to 1c) of Policy SP7, clarity could be provided on what “making good” the loss or damage of assets is referring to (i.e. whether this is a requirement for the replacement/re-provision of assets on site or in nearby locations).
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11382
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	It is noted from the Draft IDP that off-site financial contributions will be the mechanism sought to meet most of the infrastructure needs arising from future growth in Kings Langley. Meeting primary education needs arising from growth in Kings Langley is a concern given that the Draft IDP notes a lack of expansion capacity of existing primary schools and that the proposed sites in Kings Langley are not of a scale to support the provision of a new primary school on-site. It is considered that residents occupying the proposed developments in Kings Langley would look to the nearest or most convenient facility to them; this may include primary schools in Three Rivers, albeit the nearest existing primary schools in Three Rivers being some distance from the KL02 Rectory Farm site in Abbots Langley and Bedmond. We note that the Draft IDP states that a Primary School Sites Search is being carried out to identify the best possible site in South Hemel. TRDC are committed to continued joint working with Dacorum BC and HCC in order to address this cross-boundary issue and potential impacts for primary school demand and supply in TRDC and DBC.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11425
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>1 <b>Delivering the Infrastructure to Support Growth</b>  The problem inherent here is that developers build houses and councils build roads and schools etc. As we have seen in the past, the infrastructure does not match the housing. I appreciate that this is look back, but lessons must be learnt. LA3 was agreed without a proper control over traffic information. What information was available was ignored. This extends beyond traffic. The vision for an inclusive development has morphed into an extension of Hemel. It will have no sense of community. Infrastructure planning is vital.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11440
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11523
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The proposed level of development in Dacorum, along with development in the surrounding areas also (St Albans and District, Three Rivers District, Buckinghamshire east of Aylesbury), would mean a wholly unacceptably burden on all infrastructure services and facilities. The plan does little to ensure the infrastructure is fit for purpose of the potential influx of new and existing residents.</p> <p>The extent of new housing proposed is expected to put severe strains on water supplies to Dacorum and in times of drought there would be no option but to extract water from the chalk aquifer which in turn would cause detrimental impact to the Borough's chalk streams. New water supplies are unlikely to 2030+.</p> <p>The extreme growth proposed by the strategy would require significant infrastructure improvements in order to transport and treat wastewater and sewage. This could take as much as 10 years to complete and be extremely expensive, alongside significant disruption to the community.</p>

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11679
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11724
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Re 10: Delivering the Infrastructure...</p> <p>As evidenced by existing concern of residents, this is already a major issue. The Plan does not really address the massive improvements and new infrastructure that would be required for the development proposed in the Plan. Expecting it to be delivered piecemeal by developers is not viable. Yes, they should contribute to the cost, but infrastructure is something for which there must be strategic planning by DBC, and at a level that does not cause harm to the environment or quality of life of existing residents.</p> <p>In particular, water supply and waste water disposal are mentioned but not considered in any meaningful way. These factors are ones which necessarily put a limit on the amount of development that can take place in the area. Climate change is likely to increase the significance of these factors. The Chalk streams in the area are of international significance, and Dacorum had a legal duty to protect them, which means that no additional extraction of water from the chalk aquifer can be allowed. And there is already too much extraction from the aquifer in times of drou, which are likely to become more frequent. So action should be taken now to obtain alternative water supplies, and it is estimated that these would take ten years to become available.</p> <p>Waste water disposal must also be planned for the area as a whole, in advance of development, so that there is no damage to the environment. It should not be something that is “tacked on” to conditions for developers. The let-out of “exceptional circumstances” is now outdated in the context of climate change, and must not be used to excuse unacceptable levels of inappropriate waste water disposal.</p> <p>The measures outlined in Policy DM33 are not adequate.</p> <p>This is yet another instance where the Council is failing in its legal duty to protect the environment.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11769
<b>Person ID</b>	1118045
<b>Full Name</b>	Mr Padraig Dowd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	

<b>Delivering Infrastructure to Support Growth Strategy comment</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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11811
<b>Person ID</b>	398725
<b>Full Name</b>	Mr Valter 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<b>2. Infrastructure – The Dacorum Local Plan is simply addressing the perceived need for housing growth without taking into consideration any infrastructure and services requirement. It simply says that they work closely with other authorities and we do not feel that this is good enough. It has to be a pre-requisite that the infra-structure such as roads, water/waste water supply and broadband together with services such as schools, doctor’s surgeries, dentists and local shops are in place before large housing developments are undertaken. This is particularly relevant for the development in Bovingdon eg over 200 new properties. It is naïve to believe that those 200+ new houses will be built over an 18 year period. Once a development on a single site has commenced they will be built within a short period of time – no developer will build 10 houses per year as it will not be profitable. The infra-structure needs to be put in place before the development of the site commences.</b>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11842
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>I am afraid that Dacorum's planning history has led to poor planning approval resulting in increased traffic volumes, insufficient parking arrangements ie development of the old Sappi and DRG/ Dickinson and no or little provision of infrastructure.</p> <p>A " Blue sky " approach could lead to a futuristic building approach maintaining the village life where appropriate and also build hubs of activity in town centres.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11871
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<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> <p>(21)</p> <p>Sustainability Transport Connectivity – 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>
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11929
<b>Person ID</b>	1269347
<b>Full Name</b>	Rebecca Braybrooks
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Your plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses.
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS11938
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	In addition, 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 our 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.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS11951

**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

**Delivering Infrastructure to Support Growth Strategy comment** 10) 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.

**Infrastructure & sustainability**

- The transport study takes *no* account of Berkhamsted’s geography and valley setting. Most building is proposed along the top of the valley. The residents of these houses will need to access the town and, owing to the steep hills involved, will by-and-large use their cars, exacerbating existing traffic congestion and parking problems.
- There are no significant proposals for improvements to roads or traffic flow. All additional traffic created will feed on to Shootersway, Kings Road to town/station, and various rat-runs to avoid inevitable congestion and pollution.

- There are no significant improvements proposed for Berkhamsted’s traffic situation, which is already excessive.
- Residents from the new housing needing to access the north side of the town and beyond will increase the flow over roads that are already blighted by volumes, speeding and pollution. Gravel Path and New Road suffer from choke points over the canal or under the railway or both, creating knock-on congestion back into the town.
- No proposals have been made to improve walking/cycling/public transport routes. These are essential given the steel hills between the majority of the new housing and the town
- No significant improvements to public open spaces (apart from garden-sized suggestions only.)
- The ‘wildlife corridors’ are simply a narrow strip along the A41, and don’t connect with any meaningful habitats (no proposed tunnels for wildlife to go under A41 to access further green/habitat areas.)
- No additional health services – new surgery at Gossoms End is supposed to be able to cope with ALL the new developments. A minor extension of Manor Street is proposed.
- The nearest hospitals are already operating beyond their capacities, and there is no provision for increasing their capacity to cope with the increased numbers of residents planned
- The Plan claims that 2 primary schools and a secondary school will be built in Berkhamsted. It does not set out who will do this and how it will be funded.

**Water**

- DBC is relying on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. It’s not clear what impact the development proposals will have on this, as well as sewage – especially with a greater number of housing suggested. Again, any planning actions based on this flawed plan will be highly vulnerable to judicial review.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS11982

**Person ID** 1269352

**Full Name** Walid Youssef

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* **Yes**

\* **No**

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<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> <p>Sustainability Transport Connectivity – 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>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12018
<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 * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The need to provide for necessary and where appropriate, off-site infrastructure is recognised in new development proposals. However, there is the concern that Policy SP7(1) departs from guidance contained on planning obligations in the NPPG. The policy looks to require infrastructure to:</p> <ul style="list-style-type: none"> <li>• Meet and needs arising from the development.</li> <li>• Avoid or mitigate adverse, social, economic and environmental impacts.</li> <li>• Make good of the loss or damage of social, economic and environmental assets.</li> </ul> <p>The concern here is that the policy may be used to justify infrastructure that does not meet the requirements in the NPPG in terms of requiring such infrastructure necessary to make a development acceptable in planning terms. The requirements in bullet points A, B &amp; C are sufficiently vague and broad that it brings into question whether some development contributions sought in the future under this policy are “necessary” or “directly related” to the proposed development. Furthermore, the need to make good any damage against identified assets could fail the test of an obligation being “fairly and reasonably related in scale and kind to the development”.</p>

The final concern is the Plan's reliance on a Supplementary Planning document to detail the Council's approach to secure and develop a contribution. In preparing such a document, DBLP wish to stress the guidance on SPG's and the NPPG which looks to avoid such documents that would introduce planning policies or unnecessary financial burdens.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS12048

**Person ID** 330363

**Full Name** Mr. Graham Lay

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy 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** Delivering the Infrastructure to Support Growth

**ID** EGS12121

**Person ID** 1269413

**Full Name** Mr Chris Wallis

**Organisation Details** Hon. Director of Development  
Tring Sports Forum

**Agent ID**

**Agent Name**

<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>1 <b>Delivering the Infrastructure to Support Growth</b></p> <p>10.2 We will comment on the evolving IDP separately</p> <p>10.5 As previously mentioned, TSF have had no input as a stakeholder for some time. We trust that this will change in the very near future.</p> <p><b>Policy SP7 – Delivering Infrastructure</b></p> <p>No objections</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12172
<b>Person ID</b>	1269444
<b>Full Name</b>	Mr & Ms Jim & Katie Barnard & Partridge
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><u>Wider Transport Infrastructure Impacts:</u></p> <p>It is very probable that there is not enough local employment to satisfy the needs of the volume of new residents the plan suggests in Berkhamsted. Despite whatever we project the long-term impact of COVID lockdown on working patterns to be, there is a risk that the proposal will result in a significant increase in the number of local residents using rail links to London (in particular). Train capacity has been unacceptably strained at key times of the day pre Lockdown – with many residents failing to get a seat, space to stand comfortably or get onto the required train at all. Further, the platforms are crowded and the facilities at the station are already beyond capacity at certain times of day. Further rail usage will exacerbate this problem. The plan as we have read it does not detail considerations of this.</p> <p><u>School Provision:</u></p>

The schools within Berkhamsted are already over-subscribed (primary and secondary), which often results in parents not getting their closest school. The knock on impact of this is that many are not able to walk to school and therefore drive – which further puts pressure on the road infrastructure in Berkhamsted. The location of the proposed sites in the plan will only exaggerate this further and the current proposed schooling provision will not in our view address this adequately.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS12315

**Person ID** 1269489

**Full Name** STEVE HILL

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

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

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS12345

**Person ID** 1269490

**Full Name** MIKE WHIT

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>New houses will need to have measures to transport and treat wastewater and sewage. The Adopted Core Strategy 2006-2031 for Dacorum Borough said that ‘developers should ensure that there is sufficient capacity at the relevant wastewater treatment works. It also stated ‘the most pressing (infrastructure) issue is that of sewage treatment infrastructure, which will need significant upgrades to serve the development proposed in the wider area, including that in Decorum.’ This is not covered by the new local plan!</p> <p>I believe that the areas where the council want to build are not in the same area as Waste water Treatment Works (WwTW) or trunk sewers, therefore causing massive expense in building houses that the local people of Berkhamsted and Northchurch just do not need.</p> <p>The council must take onto account climate change which is causing differences in our weather and therefore water in the area</p> <p>Lots of new houses will put a strain on water supplies, and particularly as we enter a time of severe climate change. The Council must not go ahead with building which would affect the chalk aquifer which could then damage the chalk streams in the area, (the Gade, Bulbourne and Ver). Chalk streams are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12381
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Development policies must take into account the geology and geography of the area. Tring, Northchurch and Berkhamsted are in valleys, with limited water supply, low rainfall, internationally important chalk streams which must be enhanced, and congested roadways. Any proposed increases in population will impinge on these aspects. The plan includes huge

increases without details of how these infrastructure requirements will be met. It should include better public transport-preferably electric, (possibly supported by supermarkets), reduced need for cars, water saving requirements on planning -such as grey water systems, sewage improvements to prevent river pollution, etc. The plan is too vague on these aspects.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS12389

**Person ID** 232349

**Full Name** Mr Lawrence Parnell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

**Services and Facilities.**

The ‘Overarching Vision for Growth by 2038’ (sic) (Part 1, page 24) states that Kings Langley will have strengthened its role in providing services and facilities to serve residents and the adjacent rural communities; and (will) have secured additional and improved local community facilities’. Yet in Part 2, page 242, Delivery, none are identified nor is there any recognition of the immediate, and likely further, additional demand emanating from the TRDC area.

Planning for Kings Langley cannot function or deliver cohesively when the two Authorities (DBC and TRDC) respectively responsible for its adjacent parts do not consult, and integrate their Plans.

Para.23.178 implies that Kings Langley has just one GP practice. Really! Please check.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS12433

**Person ID** 1146040

**Full Name** Mrs Rachel Macdonald

**Organisation Details**

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Delivering the Infrastructure to Support Growth</b></p> <p>The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12450
<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>Delivering Infrastructure to Support Growth Strategy 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>

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.

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%.

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, 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.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12462
<b>Person ID</b>	498378

<b>Full Name</b>	Mr Paul Dunham
<b>Organisation Details</b>	Clerk to the Council Kings Langley Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Regarding infrastructure, in Kings Langley the schools and health services are currently over-subscribed, local entertainment is limited to pubs and restaurants and the roads are over-loaded. Peak time traffic levels bring the High Street to a standstill in the morning and late afternoon, with Heavy Goods Vehicles exacerbating this issue, particularly when any of the surrounding roads or A41 by-pass are busy or closed for accidents or repairs. In addition, public transport services are very limited during the day, with a daily bus service only between Aylesbury and Watford buses and not running past 7pm for 6 days of the week nor beyond 6pm for the hourly service on Sundays. This is not an attractive proposition for young people or young families outside the village who would prefer to live in towns where they would be better served with a higher level of education and health services, public transport and other amenities.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12471
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>6. Education Need</b></p> <p>We note in paragraph 23.51 that the Local Plan refers to ‘a secondary school is required in East of Hemel Hempstead Growth Area (in St Albans district) to meet Dacorum’s needs.’ SADC does not consider that to date there is appropriate school need, existing school expansion capacity and site selection evidence to reach such a conclusion. We look forward to further engagement with DBC and HCC on this important topic.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12478
<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	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all 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. We have particular concerns regarding the impact on water supply, waste water disposal and the destruction of the Greenbelt.</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>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.</p>

The plans also suggest destroying Greenbelt land.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS12547

**Person ID** 1269544

**Full Name** Ms Lindy Foster Weinreb

**Organisation Details** Chairman  
Berkhamstead Citizens Association

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

We note the comments in section 10 and **SP7 Delivering Infrastructure** SP7.3 references “timely and comprehensive manner to support new development.”

We wish to avoid the scenario where the promised infrastructure is delayed and residents experience the resulting adverse impact.

Accordingly, we consider a stronger statement is required that ensures provision is delivered ahead of the time when provision is regarded as overdue to meet the needs of the development.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS12613

**Person ID** 1207604

**Full Name** Thames Water Planning Policy

**Organisation Details** C/O Savills

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Policy SP7 relates to the delivery of infrastructure. Any necessary sewerage network upgrades required to support growth will be delivered by Thames Water and funded through the Infrastructure Charge on development connecting to the network. However, the timescales for the delivery of infrastructure can vary. To understand, design and deliver local network upgrades can take around 18 months and Sewage Treatment Works upgrades can take 3-5 years. Thames Water would therefore seek text within Policy SP7 and the supporting text to support the use of planning conditions to prevent the occupation of development ahead of the completion of any necessary upgrades and to encourage developers to engage at an early stage with Thames Water. It will also be necessary to understand the location and timing of delivery of the allocations in the Local Plan, taking account of any changes in housing numbers, so that any necessary sewage treatment works upgrades can be planned and delivered.</p> <p>In order to ensure that wastewater infrastructure is delivered alongside growth it is considered that the following supporting text and policy wording is incorporated to Policy SP7.</p> <p>Proposed new policy supporting text: <i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i></p> <p>Proposed additional policy text: <i>“Where appropriate planning permission for developments which result in the need for off-site upgrades will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades.”</i></p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12714
<b>Person ID</b>	1269600
<b>Full Name</b>	Alex Marsh

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS12807
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<ul style="list-style-type: none"> <li>• The plan is vague on how infrastructure would be delivered</li> <li>• The plan ignores that water extraction from aquifers is already at limit and has no proposals to deal with waste water/sewage disposal which already seems to be at capacity in Berkhamsted</li> </ul>

- The plan doesn't address how substantially increased traffic flow in Berkhamsted would be managed.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS12874

**Person ID** 1207443

**Full Name** Mrs Jennifer Bissmire

**Organisation Details** Clerk  
Markyate Parish Council

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

The Infrastructure Delivery Plan is not in place, and the costs are likely to be considerable if deliverable. The area is lacking in rainfall.

The hilly nature and the distance of many villages from transport hubs or community facilities makes walking or cycling to reach them prohibitive. The ageing population may be fitter these days but the distances involved mean that cars or public transport are the only options for many to access transport hubs or community facilities.

A key requirement of the Dacorum Local Plan is to ensure that there is sufficient and appropriate infrastructure in place to meet the planned growth... Consultations have highlighted that this is a fundamental concern of our residents. There is nothing in the Sustainability Development Strategy to allay these concerns.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS13047

**Person ID** 1270013

**Full Name** Mr Daniel Ritchie

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13089
<b>Person ID</b>	1264779
<b>Full Name</b>	James Froggatt
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Amenities and Services</p> <p>All housing needs to adequately serviced</p> <p>The plan should include:</p> <ul style="list-style-type: none"> <li>• A new Hospital with an Accident and Emergency, Obesity Centre, Drug Rehab Unit, Elderly specialism, Mental Health Specialism and should be a teaching hospital for nurses and doctors</li> <li>• An adequate police station with at least a dozen custody cells</li> <li>• Library capacity at least 4 times bigger than the current service</li> </ul>
<b>Included files</b>	

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13097
<b>Person ID</b>	1270037
<b>Full Name</b>	MRS GINA BARLOW
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy 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, the plan is not at all sustainable. Berkhamsted is situated in a valley the new developments have been located on the ridges, which means that all potential new residents will rely on cars to navigate around the town. The plan only makes provision for widening pavements and adding a few cycle routes to a hilly town.</p> <p>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. 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>

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.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS13112

**Person ID** 1264860

**Full Name** Alan Coughtrey

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

Lack of provision for green space generally.

Water supply and waste water disposal

The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 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** Delivering the Infrastructure to Support Growth

<b>ID</b>	EGS13128
<b>Person ID</b>	1270061
<b>Full Name</b>	Mrs Coughtrey
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Lack of provision for green space generally.</p> <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>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13171
<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 * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13185
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p>

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

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

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS13213

**Person ID** 1270128

**Full Name** Richard Salway

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

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.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS13277

**Person ID** 1270156

**Full Name** Ms Pauline Taylor

**Organisation Details**

**Agent ID**

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Also will All this building would there be enough water supply not to effect existing tenants? Why with this explosion of building increasing the population no hospital and purpose built entertainment ie theatre for concerts and such.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13326
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<ul style="list-style-type: none"> <li>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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13365
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>(10) Delivering Infrastructure to support growth – the IDP fails to adequately address issues, including traffic, water and wastewater as well as social needs and is incomplete which reflects the reality that infrastructure always lags the development it is meant to serve . Tring is a very congested town during peak times with all main exit roads leading out of town becoming over congested with queuing cars and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.</p> <p>GPs and schools are oversubscribed with Tring residents being refused places in primary schools. This causes additional traffic to schools located outside town in surrounding villages. This is very damaging to the environment and adds to the problem of unsustainability, traffic congestion and air pollution.</p> <p>Tring train station car park is far too small for the town already and many commuters have to leave their cars in undesignated places all along various roads surrounding the station. Buses to and from the station are infrequent therefore not solving the problem of commuting in a car.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13392
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13456
<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> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The sheer size of the proposals places an enormous strain on existing infrastructure, from roads to utilities such as water and sewage. The plans already state that there is little room to expand the road system in the valley, so how can we expect any improvements in current traffic congestion issues in the town? Current water supply and disposal will be adversely affected. The environmental impact will be substantial.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13487
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	6. Infrastructure and Place 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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13543
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13834
<b>Person ID</b>	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>Delivering Infrastructure to Support Growth Strategy comment</b>	Policy SP7: Transport and Movement: the provision of cycle lanes/pedestrian routes needs to be properly thought out. The attempt to do this on Station Road has led to a widened but non-demarcated path which is dangerous to pedestrian and cyclist alike.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13892
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	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>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13933
<b>Person ID</b>	1145435
<b>Full Name</b>	Mr Paul Crosland
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Although many aspects of infrastructure provision – roads, public transport, schools and health services as well as utility services – are outside the remit of DBC to provide, there are no assurances given in the Draft Local Plan that the planned increases in housebuilding will be matched by infrastructure provision in advance of any new development.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13954
<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 * No	Yes

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Although many aspects of infrastructure provision – roads, public transport, schools and health services as well as utility services – are outside the remit of DBC to provide, there are no assurances given in the Draft Local Plan that the planned increases in housebuilding will be matched by infrastructure provision in advance of any new development.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS13994
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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 . Berkhamsted is a very congested town, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14047
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Delivering the Infrastructure to Support Growth Insufficient commitment to water supply and sewage.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14149
<b>Person ID</b>	1163439
<b>Full Name</b>	Lindy Weinreb
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Delivering Infrastructure (and IDP) I note the comments in section 10 and SP7 Delivering Infrastructure SP7.3 references ‘timely and comprehensive manner to support new development.’</p> <p>I wish to avoid the scenario where the promised infrastructure is delayed and residents experience the resulting adverse impact. Accordingly, I consider a stronger statement is required that ensures provision is delivered ahead of the time when provision is regarded as overdue to meet the needs of the development.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14251
<b>Person ID</b>	1152075
<b>Full Name</b>	Rob Wakely
<b>Organisation Details</b>	

<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14281
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	(10) 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 . Tring and Berkhamsted are already very congested towns, at peak times the roads are gridlocked and the addition of development on the edge of town will increase car based travel. The town simply cannot accommodate this scale of additional traffic.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14314
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Reference the Sustainable Transport Strategy for Tring</p> <p>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.</p> <p>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.</p> <p>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.</p>

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** Delivering the Infrastructure to Support Growth

**ID** EGS14362

**Person ID** 1270640

**Full Name** Geoffrey Llewellyn

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Delivering Infrastructure to Support Growth Strategy comment** Water and sewerage. We know that both of these are already overstretched. The rivers cannot sustain any further abstraction. There have been sewerage overflows in recent years. In Devon 1970s there was a **moratorium on housing**

**until the water and sewerage supply problems had been addressed. DCB should do this now in the interests of its current residents.**

Road systems. The Plan acknowledges that they are already inadequate for the present population. The A41 was built for a fraction of the traffic that now uses it and would require at a minimum, extensive improvement to its slip roads. NO mention of this is made in the Plan or how it is to be financed. The town centres are clogged. No part of the plan addresses public transport infrastructure, where it will run or how it will be paid for. No part of the plan addresses the air quality in the centres of the towns affected.

Schools. The need for these is driven essentially by the impossible housing target accepted by DCB.

Healthcare. In West Herts the healthcare provided is already **below the National Average**. It's a disgrace. Rather than pressing for the re-opening of Hemel Hempstead hospital, which was designed with the possibility of expansion, the Plan envisages building on that site. That would be acceptable if another hospital was being built in the centre of the West Herts area as proposed by the Hospital Action Group.

DCB could be putting its weight behind these proposals in the interests of its constituents. Instead it ignores the need to provide adequate healthcare within the Borough.

**There should be another moratorium on further housing until healthcare provision is at least as good as the National Average.**

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS14420

**Person ID** 1270662

**Full Name** MAX GOODE

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No**

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14555
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The 2010 Water Cycle Study Scoping Study (part of the evidence base for the Strategy, produced for five Hertfordshire LPAs including Dacorum), was based on two growth scenarios presented by the emerging Regional Spatial Strategy. For Dacorum Scenario 1 was 9,000 new homes in the plan period 2006-31, and Scenario 2 was 17,000 new homes (680 dwellings a year for 25 years). The Study concluded that Scenario 1 (across the Study area) would not allow any water surplus past 2030, while Scenario 2 would require the additional imports of water from 2024 during critical periods.</p> <p>There is no mention in para 10.4 of the Strategy of the improvements to the water supply (and wastewater) infrastructure which were identified as being required in the Water Cycle Study Scoping Study.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14558
<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> * <b>Yes</b> * <b>No</b>	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The Adopted Core Strategy 2006-2031 for Dacorum Borough states that ‘developers should ensure that there is sufficient capacity at the relevant wastewater treatment works’. It also states: ‘The most pressing (infrastructure) issue is that of sewage treatment infrastructure, which will need significant upgrades to serve the development proposed in the wider area, including that in Dacorum.’</p> <p>The current Strategy makes no mention of the specific need for wastewater infrastructure improvements (para 10.4 on page 49), although Policy SP7 sets out the mechanism for delivering infrastructure which places that responsibility on developers. Such infrastructure is to be delivered ‘in a timely and comprehensive manner to support new development’. Policy DM35 (on page 126) states that development which would cause a significant increase in water pollution (among other effects) will not be permitted.</p> <p>The 2010 Water Cycle Study Scoping Study sets out a long list of wastewater treatment (WwTW) and sewerage issues across the five LPA areas which needed to be addressed to accommodate the growth levels proposed at the time. It states (on page 4): ‘a number of potential growth locations are located to the opposite side of existing settlements with regards to the WwTW or trunk sewers. Any network upgrades required through the existing settlement will be expensive and disruptive, and may therefore be cost prohibitive, particularly if funded by developers.’ (See the note about delivery below.)</p> <p>The above situation applies to housing proposals on the northern edge of Hemel Hempstead. The town’s waste water currently goes to the Maple Lodge WwTW. The Water Cycle Study Scoping Study states that the Maple Lodge WwTW (or Blackbirds WwTW, dependant on TWU strategy) will require substantial upgrades under both growth scenarios. Limited space at Maple Lodge WwTW may make this problematic. Higher wastewater flows also have potential impacts on water quality, including downstream of WwTWs, and, as noted above, during storm events which are expected to increase in severity due to climate change.</p> <p>The Study also states: ‘The potential growth at Hemel Hempstead (and Kings Langley) is a large proportion of the total growth within the Maple Lodge catchment, under either scenario. TWU (Thames Water) may have to implement unconventional (hence expensive and potentially carbon intensive) processes at the WwTW to achieve these standards, along with majorly increasing the hydraulic capacity on site.’ It goes on: ‘This may take up to ten years to plan, design and construct subject to financial and technical feasibility of the required upgrades. In addition, the potential growth locations around Hemel Hempstead may require extensive upgrades to the sewerage network throughout the existing settlement.’</p>

Such upgrades would be disruptive, expensive and require three to five years to plan, design and construct.’ It also states: ‘Should TWU decide to divert additional flows from other areas of the catchment to Blackbirds WwTW, this could potentially release capacity at Maple Lodge WwTW to accommodate the growth in Dacorum. However, similar constraints regarding water quality, capacity, cost and timing will apply at Blackbirds WwTW as well.’

It would be helpful for the Strategy to clarify whether any of these issues have already been addressed by infrastructure improvements.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS14676

**Person ID** 1270738

**Full Name** JOHN BELL

**Organisation Details** SECRETARY

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

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.

Specifically:

- The transport study must take into account of Berkhamsted’s geography and valley setting. Most building is proposed along the top of the valley.

- Significant proposals should be made for improvements to roads or traffic flow. All additional traffic created will feed on to Shootersway, Kings Road to town/station, and various rat-runs to avoid inevitable
- Proposals must be made to improve walking/cycling/public transport
  - Significant improvements should be described for public open spaces (apart from garden-sized suggestions )
  - The 'wildlife corridors' must be more than a narrow strip along the A41, and must connect with meaningful habitats (e.g. tunnels for wildlife to go under A41 to access further green/habitat )
- Additional health services must be provisioned. The new surgery at Gossoms End is will not be able to cope with ALL the new developments. At present, only a minor extension of Manor Street is

The current Local Plan relies on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. The revised Local Plan must make it clear what impact the development proposals will have on this, as well as sewage – especially if after review there is still a greater number of housing suggested.

The level of new housing currently proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030.

The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14735
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><i>infrastructure requirements will be delivered directly by the developer or responsible and/or through an appropriate financial contribution prior to, or in conjunction with, new development <b>commensurate with development impact</b>. <b>Where necessary</b> and appropriate, developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site.</i></p> <p>3 .....</p> <p><i>The phasing will be determined in relation to the needs of each development and the overall requirements <b>to mitigate impact of the development at that location.</b> <del>growth in that settlement.</del></i></p> <p>1 <i>It will be expected that infrastructure requirements set out in the Infrastructure Delivery Plan will be delivered, however, <b>where justified and unless</b> <del>where</del> it can be demonstrated that the infrastructure requirements could render the development unviable, <b>in which case</b> proposals for major development should be supported by an independent and transparent viability assessment that accords with Planning Practice Guidance. Where viability constraints are demonstrated by evidence, the Council will:</i></p> <p>1 <i>Prioritise developer contributions for critical, essential and required infrastructure based upon <b>the technical impact assessments submitted to support planning application schemes identifying point of impact, mitigation and enhancement measures</b> and <del>details of requirements outlined in the Infrastructure Delivery Plan ...</del></i></p> <p>As recognised in the draft policy and stated in supporting paragraph 10.5, “the production of an IDP is an iterative process as infrastructure is continually being delivered through the development management process”. Therefore, it will be updated over the course of the Plan period in consultation with relevant bodies and stakeholders and will be expected to be accompanied by up to date evidence to justify any changes from previous versions consulted on.</p> <p>This policy sets out how infrastructure requirements and contributions may be sought from developers in relation to new development. However, as set out in the NPPF and CIL Regulation 122, planning obligations and contributions can only be sought where necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to development. The wording of the Policy needs to reflect this to</p>

ensure that any such requirements and/or contributions are a result of detailed testing at future stages and based on technical impact.

These amendments to the policy wording are important to ensure the process remains transparent throughout but also allows for any change in circumstances over time so as to not undermine the deliverability of the Plan and can be considered to be consistent with paragraphs 34 and 57 of the NPPF in satisfying the tests of soundness.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS14746

**Person ID** 1270760

**Full Name** LQ Estates

**Organisation Details** LQ Estates

**Agent ID** 1270759

**Agent Name** Miss  
Hanna  
Mawson

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment** 4.6 This draft policy sets out the requirement to provide for necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Any appropriate financial contributions sought must meet the requirements set out in the National Planning Practice Guidance. The supporting text sets out that the Infrastructure Delivery Plan (IDP) has been developed through consultations with stakeholders and infrastructure providers. The IDP will continue to evolve throughout the Plan Period and should be informed by discussions with developers and landowners around viability.

4.7 The Plan will need to be informed by a viability assessment. National Planning Practice Guidance (NPPG) on viability is clear that the drafting of plan policies should be informed by engagement with developers, landowners and infrastructure and affordable housing providers. L&Q Estates are happy to engage with the process at the appropriate time.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS14806

**Person ID** 1264510

<b>Full Name</b>	Martin Evening
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>5. The Dacorum DLP does little to address improvements in the infrastructure services and facilities in Dacorum required to support the proposed increase in housing.</p> <p>We live on (addressed removed) and have continuous problems with water pressure which drops so low and even stops during the summer months. The level of new housing proposed is expected, under drought conditions, to put severe strain on water supplies to Dacorum during the 2020s.</p> <p>The growth proposed by the DLP would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This could take years to complete and be extremely expensive as well as disruptive to the affected communities.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14812
<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> * Yes * No	Yes

<b>Delivering Infrastructure to Support Growth Strategy comment</b>	The proposed level of development in Dacorum, along with development in the surrounding areas also (St Albans and District, Three Rivers District, Buckinghamshire east of Aylesbury), would mean a wholly unacceptable burden on all infrastructure services and facilities. The plan does little to ensure the infrastructure is fit for purpose of the potential influx of new and existing residents.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14838
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Section 10 - Delivering the Infrastructure to Support Growth In this section the plan addresses the need for major improvements to roads and other transport services. The allocation of our clients' site would involve developer funded provision of necessary road improvements without requiring public funds.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14851
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	This draft policy sets out the requirement to provide for necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Any appropriate financial contributions sought must meet the requirements set out in the National Planning Practice Guidance.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14881
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The destruction of Green Belt land and the harm to the Chilterns AONB is all the more irresponsible, given that the existing infrastructure is either already inadequate or will soon be insufficient, given current and planned increases on current housing levels. The planned 25% increase in housing proposed in the Plan cannot be put forward without radically rethinking the infrastructure in the area in a way that is likely to involve far more significant impacts on Green Belt land and cooperation from third parties over whom DBC has no direct influence (e.g. the rail service).</p> <p>As recognised in the Appendix to the Sustainability report, the train network is already running at capacity with no improvements planned.<sup>22</sup> The huge increase in housing in Tring and Berkhamsted will not be attractive to buyers if they are unable to commute to locations (such as London) offering employment opportunities. (Neither location is able to offer significant such opportunities itself.) The road system is also under strain: "<i>All the key roads in south-west Hertfordshire</i></p>

are under pressure from heavy levels of traffic, and associated congestion, which has adverse effects on air quality, quality of life and the local economy".<sup>23</sup> It is entirely unclear how the massive increase in the size of Berkhamsted and Tring will be accommodated on the road and public transport system – given that the same roads, trains and bus services serve both towns.

The Sustainability Report also notes that cycling routes - in particular those to stations - are already "*considered to be inadequate*".<sup>24</sup> (It appears that Dacorum has only 21 miles of cycle paths in the entire borough,<sup>25</sup> which is woefully inadequate.) Unsurprisingly, the recent Hertfordshire Transport Plan states: "*continued reliance on high levels of car use will lead to worsening congestion and journey time reliability, both of which are constraints on economic growth. Further traffic growth and congestion will have a negative impact on public health and the quality of the urban, rural and natural environment*".<sup>26</sup>

The 'Emerging Strategy for Growth' appears to recognise some of these concerns, in the introductory sections, which note, for example that "*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 walking and cycling infrastructure*".<sup>27</sup> But when it comes to putting forward parcels of land for consideration, that objective appears not to be remotely achievable in a number of cases. The sites around the South West of Berkhamsted / South of Northchurch are particularly poorly connected from this perspective. The growth of electric bike ownership (which most people would not view as a not a realistic way to go shopping, or take children to school, etc) is not sufficient mitigation against the poor location of these sites. It should also be recognised that the only concrete proposal for Berkhamsted and Tring in the Hertfordshire Local Transport Plan are upgrades to cycle facilities - while welcome, this will be insufficient for the proposed level of growth.

<sup>22</sup> Appendices to Interim Sustainability Appraisal Report, p.76.

<sup>23</sup> Interim Sustainability Appraisal Report, p.20.

<sup>24</sup> Interim Sustainability Appraisal Report, p.20.

<sup>25</sup> Dacorum Local Plan Emerging Strategy for Growth 2020-2039, p.20.

<sup>26</sup> Hertfordshire Local Transport Plan, 2018-2031, p.5.

<sup>27</sup> Dacorum Local Plan Emerging Strategy for Growth 2020-2039, p.15

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14888
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Policy SP7 correctly notes the need for enhanced However, insufficient details are given, and other parts of the Plan and the associated evidence base suggest that minimal new infrastructure is planned for Berkhamsted (see also above).
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14919
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	The Growth Area allocations will result in significant upfront cost/investment in infrastructure in terms of highways (roads, roundabouts, pedestrian/cycle paths, signage/gantries/lighting ) and the installation of services/utilities (electricity/gas, water/drainage, and media). The allocations would also result in a significant loss of prime agricultural land in or directly adjacent to the Chiltern AONB.

Not only does this raise considerable concerns regarding the impact on the Chiltern AONB, as well as the prolonged construction time over many years, it is also likely to result in deliverability and completion issues due to ongoing costs of infrastructure.

With this in mind, it is difficult to see how these allocations will be financially viable such that they could sustainably maintain a consistent delivery rate and supply of housing over the plan period. This is particularly important as the ESG contains some very ambitious housing completion targets during the middle of the plan period. The housing trajectory nearly doubles from 753 new dwellings in 2024/2025 to 1,347 new dwellings by 2027/2028. Furthermore, the small collection of large allocations is not only under significant pressure to deliver housing, but also under pressure to deliver them without compromising quality. Consideration will need to be given to the government's 'Building Beautiful' agenda and forthcoming National Design Density of housing development to create successful places, will play an important role and there concerns that large allocations once divided into phased parcel would struggle to implement the quantum of development.

Viability and delivery issues that are often experienced by large, phased allocations can easily stall the construction process and subsequently delay delivery. Further evidence needs to be provided to demonstrate that the Growth Areas are deliverable in that regard and why the alternative strategy of dispersed growth has been discounted.

There is significant uncertainty regarding the levels of infrastructure investment required, ambitious delivery rate/supply, and quality of development of the Council's ESG. It is therefore advised that the Council reassess its ESG to relieve the pressure on large allocations in towns by distributing housing across the This strategy would have the benefit of achieving proportionate and more sustainable growth, whilst simultaneously maintaining and growing smaller settlements, particularly local businesses, services and community facilities. It would also increase the amount of choice people would have to live and work. The increase in distribution of housing to all parts of the Borough would also prevent the creation of property hot spots where house prices are too expensive. With the average house price in Dacorum being £453,950 (versus the national average of £269,000 – according to the ONS January 2021) this is a fundamental concern which the ESG should be addressing. More housing in more locations creates more choice and better, more inclusive, and sustainable communities.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS14948

**Person ID** 1270499

**Full Name** Hertfordshire County Council Property

**Organisation Details** Property Team

**Agent ID** 1263792

**Agent Name** Ms  
Claire

	Newbury
<b>Agent Organisation</b>	Senior Associate Vincent and Gorbing
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><b>Infrastructure Delivery</b></p> <p>HCC agrees with the approach that the right infrastructure needs to be provided at the right time [and in the right location] to support the level of growth that the plan is seeking to achieve.</p> <p><b>Policy SP7</b> seeks to secure the delivery of necessary infrastructure as part of new developments, both in terms of on and off-site requirements. The policy should make it clear that contributions towards off-site infrastructure must still relate to the needs and impacts of the proposed development and be proportionate to the scale of development being proposed.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS14965
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>There are a number of potential projects that we will lead on/participate in that will take place in Dacorum that you should be aware of and could potentially be reflected in the plan, in the infrastructure section and your Infrastructure Delivery Plan.</p> <p>The River Gade runs through Gadebridge Park. The Gade is a chalk stream but has been significantly impacted by historic channel alterations and is disconnected from it's floodplain. The project aims to:</p> <ul style="list-style-type: none"> <li>• Improve the river and the adjacent parkland for wildlife</li> </ul>

- Improve the opportunities for amenity and recreation around the river
- Improve resilience to low flow events and climate
  - Improve the ecology of the river so that it supports Good Ecological Status under the European Water Framework Directive.
    - Improve floodplain connectivity, but reduce the impact of flooding – i.e. so water can come onto the floodplain when it needs to, but that it doesn't sit on the parkland for long periods of time.
  - Address the impact of our gauging
  - Reduce the maintenance burden of the current

By 2027, the Environment Agency is looking to have collaborated with key partners and stakeholders to develop a Colne 2100 Strategy to consider and outline an immediate-to- long term approach to new and ongoing capital schemes, environmental betterment, stakeholders and partnerships, asset management with consideration of multiple climate change scenarios, and future growth.

By 2027, the Environment Agency will work with local partners and Risk Management Authorities to commission asset modelling studies within the lower reaches and tributaries of the Colne Catchment to identify opportunities within the complex system to potentially decommission or adapt assets to contribute to improve Water Framework Directive status whilst causing no additional detriment to flood risk.

There has been a lot of fluvial/surface flooding recently in Hemel Hempstead so the EA will be looking at doing an Initial Assessment of options in the area. There appears to be a lot of development potentially happening around Hemel Hempstead which means there are opportunities with partners and ourselves to incorporate flood risk reduction projects.

This is lead on by the town council with an aim to protect and enhance the River Bulbourne and the Grand Union Canal through the town.

The invasive species, Floating Pennywort, has been identified in and around Hemel Hempstead. We are currently working to co-ordinate the management of this species.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS14970

**Person ID** 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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>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.</p> <p>There are a number of potential projects that we will lead on/participate in that will take place in Dacorum that you should be aware of and could potentially be reflected in the plan, in the infrastructure section and your Infrastructure Delivery Plan.</p> <p>The River Gade runs through Gadebridge Park. The Gade is a chalk stream but has been significantly impacted by historic channel alterations and is disconnected from it's floodplain. The project aims to:</p> <ul style="list-style-type: none"> <li>• Improve the river and the adjacent parkland for wildlife</li> <li>• Improve the opportunities for amenity and recreation around the river</li> <li>• Improve resilience to low flow events and climate <ul style="list-style-type: none"> <li>• Improve the ecology of the river so that it supports Good Ecological Status under the European Water Framework Directive. <ul style="list-style-type: none"> <li>• Improve floodplain connectivity, but reduce the impact of flooding – i.e. so water can come onto the floodplain when it needs to, but that it doesn't sit on the parkland for long periods of time.</li> </ul> </li> <li>• Address the impact of our gauging</li> <li>• Reduce the maintenance burden of the current</li> </ul> </li> </ul> <p>By 2027, the Environment Agency is looking to have collaborated with key partners and stakeholders to develop a Colne 2100 Strategy to consider and outline an immediate-to- long term approach to new and ongoing capital schemes, environmental betterment, stakeholders and partnerships, asset management with consideration of multiple climate change scenarios, and future growth.</p>

By 2027, the Environment Agency will work with local partners and Risk Management Authorities to commission asset modelling studies within the lower reaches and tributaries of the Colne Catchment to identify opportunities within the complex system to potentially decommission or adapt assets to contribute to improve Water Framework Directive status whilst causing no additional detriment to flood risk.

There has been a lot of fluvial/surface flooding recently in Hemel Hempstead so the EA will be looking at doing an Initial Assessment of options in the area. There appears to be a lot of development potentially happening around Hemel Hempstead which means there are opportunities with partners and ourselves to incorporate flood risk reduction projects.

This is lead on by the town council with an aim to protect and enhance the River Bulbourne and the Grand Union Canal through the town.

The invasive species, Floating Pennywort, has been identified in and around Hemel Hempstead. We are currently working to co-ordinate the management of this species.

- – We would like the opportunity to provide comment on your IDP to provide information on environmental infrastructure in

The (SA) Report Table 4-1 Key Sustainable issues and opportunities (Page 16.) highlights “future capacity issues of waste water treatment works serving the area” (Page 18). However this is not reflected or addressed in the Local Plan policies under the 10.3 Delivering Infrastructure to Support Growth.

<b>Included files</b>	<a href="#">Copy of APT Failing 3rd Party Assets.pdf</a>
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15040
<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> * <b>Yes</b> * <b>No</b>	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Draft <b>Policy SP7</b> refers to the Infrastructure Development Plan. The draft Infrastructure Delivery Plan is not complete and has significant omissions relative to the proposed development strategy. In particular there is a lack of evidence to support the HGC proposals.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15058
<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 & Gorbings
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<b>Infrastructure Delivery</b> <p>St William support the approach of ensuring that the right infrastructure is provided at the right time to support the level of growth that the plan seeks to achieve. However, Policy SP7 – Delivering Infrastructure - appears to suggest that all infrastructure will be delivered by funding secured from development. This is not the case, as public sector spending plans must, by definition, also be aimed at ensuring that the infrastructure needs of the Borough are met; indeed, some of this infrastructure reflects the statutory duties of public sector bodies. Some elements of infrastructure (such as significant upgrades to highway infrastructure) can only be secured by public investment, with proportionate contributions from the private sector as appropriate.</p> <p>Accordingly, Policy SP7 should be amended to read</p> <p><i><u>“All new development will be required to provide for the necessary on-site infrastructure and, where appropriate, proportionate contributions to off-site requirements arising from the development....</u></i></p>

St William welcome the inclusion within Policy SP7 of the ability to review viability as schemes are brought forward. Refinement of costs and sales values at any site necessitate some flexibility on the part of DBC if the growth agenda of the DESG is to be realised. This is particularly so on higher density brownfield sites such as the National Grid land, where there will clearly be significant remedial and abnormal costs in bringing the development forward.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS15084

**Person ID** 1261425

**Full Name** Camilla Pascucci

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

Yes

**Delivering Infrastructure to Support Growth Strategy comment**

1 The Dacorum DLP does little to address improvements in the infrastructure services and facilities in Dacorum required to support the proposed increase in

We live on (address removed) and have continuous problems with water pressure which drops so low and even stops during the summer months. The level of new housing proposed is expected, under drought conditions, to put severe strain on water supplies to Dacorum during the 2020s.

The growth proposed by the DLP would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This could take years to complete and be extremely expensive as well as disruptive to the affected communities.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS15099

**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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Delivering the Infrastructure to Support Growth</p> <p>The plan must ensure that the necessary increase in infrastructure is powered electrically and the electricity demand met by sustainable sources (renewable energy).</p> <p>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.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15131
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	Section 11 of the Emerging LP has regard to <i>Neighbourhood Planning</i> and <b>Policy SP8: Neighbourhood Planning</b> is relevant in that regard. Para.11.8 acknowledges that the indicative housing requirements for the Bovingdon NP area will reflect the Delivery Strategy for the village.

Work on the NP for Bovingdon is progressing, and we can advise that the NP Steering Group is seeking to go out to public consultation on an initial draft in March/April 2021, with a view to formally submitting to the Borough Council in Summer 2021.

As part of the background work undertaken in preparation of the draft NP, BPC undertook a public consultation exercise in January 2019 to seek the views of the local population with regard to the prospects for additional housing being allocated to the village by the Borough Council in its emerging LP and, once 'made', within the NP.

The consultation exercise sought their views in relation to the various sites around the village that had been promoted through the 'call for sites' exercise undertaken by the Borough Council between November and December 2017. On the basis of the various sites that were under consideration (Grange Farm (CFS35); Duck Hall Farm (CFS43); Homefield/Louise Walk (CFS44) and Molyneaux Avenue (existing allocation), there was overwhelming support for the site at Grange Farm if any of the land around the village was to be allocated for housing purposes in the emerging LP and, subsequently, the NP.

As such, in terms of suggested housing allocations within the NP, only the two sites that are now proposed within the Emerging LP (Bv01 – Grange Farm & Bv02 – Molyneaux Avenue) will be supported within the emerging NP when it is formally submitted in due course.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS15205

**Person ID** 1264623

**Full Name** Judy Chaussalet

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

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.

<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15206
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<u>Infrastructure</u> 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.
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15286
<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	

**Delivering Infrastructure to Support Growth Strategy comment**

Chapter 10 : Delivering the Infrastructure to Support Growth

TCE support the principles set out in **Policy SP7**. However, as noted later in these representations, the IDP needs considerable further work prior to the Regulation 19 stage.

The Draft IDP

It is considered that the draft IDP provides a starting point for the purposes of the Regulation 18 consultation, however much more evidential detail will be required to support the Regulation 19 Plan.

Points to note from TCE are :

- **(18)** The text should explain that Herts IQ has agreed to be the ‘funder of last resort’ for the M1 Junction 8 improvements. This is a significant evidential point in terms of both viability and deliverability. It is also worth noting that TCE control all the land necessary to deliver ‘Project Breakspear’.
- **(44)** As noted elsewhere in these representations, the evidential base justifying Secondary Schools in both North Hemel Phase 1 and Phase 2 is not provided.
- **(16)** The total costs of infrastructure to serve the Plan is estimated at £5.7 billion with a funding gap of £3.59 billion. The IDP needs to more clearly consider the prioritisation of projects
- **(34)** The documents describe the package interventions in different ways. They should be made consistent.
- **(3)** Is the reference to an A41 to M1 link relevant to this plan?
- **(14)** TCE strongly support the objective that all development should contribute to the Sustainable Transport Strategy.
- **(Appendix B)** The total transport costs in the draft IDP appear to amount to between

£181m and £273m and this does not include the North or East Hemel Link Roads. Some of the elements in the Appendix fall in St Albans District and are more linked to East Hemel. The proposed HGC IDP will provide a better overview of total costs, timing and phasing.

Overall, on the transport elements of the IDP, TCE considers that considerable additional work is required to determine the transport interventions that best achieve the objectives but are deliverable and affordable within the Local Plan period. Also, the apportionment of costs between different allocated sites needs to be considered along with phasing. It is noted that certain items (such as HTP 6 – Link Road A414 to Redbourn Road) fall exclusively within SADC and are primarily (although not exclusively) to serve development in SADC. Consideration is needed on how to deal with this infrastructure within the IDP.

**Included files**

<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15380
<b>Person ID</b>	1248890
<b>Full Name</b>	Mr Stuart Oldroyd
<b>Organisation Details</b>	Whiteacre Ltd
<b>Agent ID</b>	1270853
<b>Agent Name</b>	Jon Goodall
<b>Agent Organisation</b>	DLP Planning Limited
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Policy SP7 Infrastructure Delivery</p> <p>These representations are prepared on the basis that, there is agreement in principle to the infrastructure requirements identified as part of the Delivery Strategy at Bovingdon. The Council's site assessment process supports the potential for the site to deliver planning gains associated with appropriate and justified financial contributions and on-site provision, including alleviating existing surface water drainage issues. This assessment was based on the site previously accommodating around 250 dwellings (as set out in the AECOM DBC Site Assessment and discussed with the council in engagement prior to summer 2020). This has been moderated down to the provision of 150 dwellings as part of the Council's preferred approach together with delivery of the same planning gains and the safeguarding of land for a new 3FE school, which our client fully Representations on the proposed approach to Infrastructure Delivery in Bovingdon must be read in this context.</p> <p>This background reinforces the requirement for clear justification of the contributions and amounts sought towards funding for future infrastructure requirements. Moreover, these representations including modifications sought to support the provision of specialist elderly housing and retain existing commercial uses, are provided in the interests of seeking to maximise appropriate and sustainable planning gain and secure delivery of the wider strategy.</p> <p>A key requirement of the Dacorum Local Plan is to ensure that there is sufficient and appropriate infrastructure in place to meet the planned growth. This needs to consider both the individual requirements arising from developments and also address the cumulative impact of growth across the Borough.</p> <p>In order to identify the infrastructure need, Dacorum Borough Council are producing an Infrastructure Delivery Plan (IDP). The IDP will identify the essential infrastructure required to deliver our growth aspirations and requirements, prioritise these according to their importance to delivering the growth strategy and set out when infrastructure is required and how it will be funded.</p>

In terms of the Draft IDP it is important to note that this is a **living document**, as confirmed via discussions with Officers. It is recognised that engagement with Hertfordshire County Council needs to continue beyond this consultation (paragraph 4.75) and was still ongoing in August 2020 (paragraph 76) in terms of site selection.

Responses have informed emerging scenarios (paragraph 4.78) though the work remains School capacity and capacity of the transport network have been key considerations (paragraph 4.80). However, in terms of the preferred option selected, the draft IDP informs requirements and timeframes for development with **no indication of 'showstoppers'** to the preferred strategy (paragraph 4.83). Ongoing work with landowners will be essential to minimise issues and to inform viability testing (paragraph 4.84). Paragraph 4.78 states:

*"The draft IDP is accompanied by an Infrastructure Delivery Schedule for each settlement which sets out the schemes that are currently proposed to take place. It also includes an Infrastructure Business Plan that identifies funding mechanisms and priorities for delivering the proposed infrastructure set out in the IDP including those covered by CIL and S106."*

Education Planning is flagged as a key issue and has been used to test scenarios based on ensuring sufficient capacity exists (paragraph 4.86) or increase places where required. The specific impact of this approach in Bovingdon is described in 4.87:

*"Increasing primary school places proved to be more of an issue with the larger villages, particularly in the case of the practical difficulties of expanding the primary school in Bovingdon. We have had to limit opportunities for expansion in these locations to ensure schooling can accommodate our growth ambitions."*

The IDP does not, however, conclude that there are any fundamental barriers to delivery of the spatial strategy, as proposed, prior to delivering an expansion of school places.

Whilst accepting the draft Infrastructure Delivery Requirements for Grange Farm in principle, these representations do not consider that the Council has yet finalised a sound or comprehensive Infrastructure Delivery Plan (IDP). Paragraph 6 of the IDP states:

*"The development strategy for Bovingdon is to provide growth broadly in accordance with the settlement hierarchy, recognising its more distant location from high order centres such as Hemel Hempstead, and the constrained nature of some of its services and facilities, including the existing primary school and less frequent public transport services. The focus for development in Bovingdon will be to:*

- Provide new market, affordable and other forms of housing.*
- Deliver new infrastructure, including new public open space and flood alleviation "*

While there is no objection to these objectives in principle, Whiteacre considers that 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 three form entry Primary School. Conversely, the proposed allocation 'Growth Bv01' does not set clear criteria for flood evaluation works. These need to be read together as part of the case for exceptional circumstances, to ensure the soundness of the emerging plan and its associated Infrastructure Delivery Plan.

In its current draft form, the Infrastructure Delivery Plan is a cause for concern because of its misalignment with the delivery strategy for Bovingdon. We consider the document is relatively clear (see paragraphs 22.3 and 22.6) in terms

of strategy and objectives. The issue is whether this is justified with corresponding requirements that have been adequately proven to be deliverable/viable and necessary.

Policy SP7 (Delivering Infrastructure), states all new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements. While flood protection is given as a priority in the schedule (associated with HMP Mount and BV02) this does not correspond with the SFRA findings on surface water and beneficial site-specific opportunities of Grange Farm.

Whilst we are in broad agreement as it is currently drafted, the conclusions on education appear to be inconsistent with the delivery of the spatial strategy and the proposed phasing of growth – namely a suggestion that insufficient capacity exists to accommodate this, and that safeguarding land does not represent a ‘deliverable’ or funded solution. Paragraph 22.13 of the IDP states:

*“For Education, the housing sites, including windfall, proposed for Bovingdon suggest an increase of 214 dwellings in the plan period, which equates to an additional child yield of 0.52 f.e (existing commitments could bring this figure up to 241 dwellings which equates to an additional child yield of 0.58f.e) when using the proposed tiered approach for calculating child yield. Although additional provision is necessary to mitigate the identified need, it does not at present appear possible to expand the education provision in Bovingdon. However, the Local plan allocation BV01- Grange Farm, refers to the provision of 3 hectares of land and a contribution to a new primary school. Therefore, funding would only be sought from the growth proposed in Bovingdon if it were possible to develop the primary education provision further. The growth required in secondary school provision would be accommodated in new school in Hemel Hempstead, a contribution of £2,503,307 is sought by HCC”.*

The draft allocation at Grange Farm is proposed to be delivered from 2025/26, although the site can deliver within 12 months of adoption. HCC forecasts project capacity on the roll by 2023/24 and this can be utilised to support the proposed development and the requirement for further financial contributions considered at that time calculated in accordance with the relevant County Council funding indices as may be in force at that juncture and subject to justification.

The promoter of the Grange Farm site accepts the requirement to (i) safeguard land for the provision of a new primary school and to provide the land, if this is demonstrated to be required, at the appropriate time subject commitments to its development being properly established, and (ii) make appropriate contributions to ‘community infrastructure’. However, as currently drafted the IDP does not properly identify the requirements, nor costs or details of projects upon which relevant contributions would be spent and as such there remains uncertainty.

In terms of the relationship between the IDP, the Delivery Strategy for Bovingdon and the land use policy requirements for Grange Farm based on the current position in evidence we would state as follows:

*(i) There is agreement to the requirement to safeguard land at Grange Farm sufficient to accommodate a new 3FE Primary School. In policy terms our client is content to ensure that the safeguarding endures and would seek to agree an appropriate timeframe for safeguarding, during which the future requirement for its use to provide for a new Primary School is In funding terms, this component is considered to represent no cost to the education authority (with nil value attached to the land) in respect of the current Delivery Strategy - in terms of achieving the minimum number of 241 homes required. Separately to (i) above our client is agreeable to the principle of making financial contributions towards*

*meeting the requirements for education infrastructure and school places. However, in terms of the Delivery Strategy any such contributions are to be considered distinct from the costs and delivery of the school, which it is not proposed to deliver as part of achieving the identified housing requirement for Bovingdon. While the amounts identified in the current draft IDP are not wholly unreasonable, the projects upon which these would be spent, and the associated project costs, are not clearly identified in accordance with the CIL Regulations.*

*(ii) Delivery of the new 3FE school would be achieved through the availability of other sources of finance, potentially as a result of contributions from additional residential development in future plan periods or from outside Bovingdon. For the avoidance of doubt, if any of the proposed financial contributions identified in the current draft IDP are expected to be available to fund the new 3FE school the relevant financial sum should be clearly and separately identified as part of the total amounts requested.*

For the avoidance of doubt our client would be amenable to providing appropriate financial contributions that satisfy the relevant statutory tests. However, as currently drafted the IDP does not adequately confirm the requirement nor the costs or details of projects upon which relevant contributions would be spent.

For the avoidance of doubt there is also no objection in principle from Whiteacre regarding support for the proposed safeguarding of 3 hectares of land at Grange Farm for a new 3FE Primary School. However, the provision of 3 hectares of land for a school, if its delivery was a prerequisite for achieving residential development under the Delivery Strategy, should otherwise be factored into the calculation of total costs and financial contributions; this does not appear to be the case. There are useful references at para 10.43 of the IDP and 4.3.1 of the Developer Contributions Guide that provide a framework for determining a proportion of land costs where any single site is not required to deliver a new school project. It is apparent that the current calculation within the costs schedule for Primary Education in Bovingdon indicates that this exercise has not yet been carried out, to arrive at the cost stated.

Overall, Whiteacre supports the spatial strategy and the settlement hierarchy to enhance the sustainability of large villages. However, Hertfordshire County Council have not provided a statement of how they are proposing to spend the proposed financial contributions sought.

As preparation of the Local Plan continues, our client would be happy to enter into specific discussions with relevant stakeholders and infrastructure providers regarding preparation of a Statement of Common Ground relating to future provision of sufficient Primary School places in Bovingdon, including timeframes for delivery of the safeguarded land. Such an approach would be fully in accordance with the relevant PPG (ID: 61-023-20190315).

- Under **Policy SP7**, Whiteacre is agreeable to the principle of making financial contributions towards meeting the requirements for education infrastructure and school places but, in terms of the Delivery Strategy, any such contributions are to be considered distinct from the costs and delivery of the school, which it is not proposed to deliver as part of achieving the identified housing requirement for While the amounts identified in the current draft IDP are not wholly unreasonable the projects upon which these would be spent, and the associated project costs, are not clearly identified in accordance with the CIL Regulations.
- Delivery of the new 3FE school would be achieved through the availability of other sources of finance, potentially as a result of contributions from additional residential development in future plan periods or from outside Bovingdon.

For the avoidance of doubt, if any of the proposed financial contributions identified in the current draft IDP are expected to be available to fund the new 3FE school the relevant financial sum should be clearly and separately identified as part of the total amounts requested.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS15460

**Person ID** 350823

**Full Name** Mrs Sue Yeomans

**Organisation Details** Chairman  
Chilterns Countryside Group

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Delivering Infrastructure to Support Growth Strategy comment**

- Whilst developers may offer infrastructural opportunities which might support proposed developments, the CCG does not accept that the balance of possible benefits and definite negative impacts can be considered equally weighted if such development requires release of significant Green Belt affording setting to the Chilterns Area of Outstanding Natural Beauty (AONB).

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS15474

**Person ID** 1271103

**Full Name** GRAHAM RITCHIE

**Organisation Details** FAIRFAX STRATEGIC LAND (HEMEL) LTD

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	SEE ATTACHED RESP
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15482
<b>Person ID</b>	1271381
<b>Full Name</b>	Alison Walker
<b>Organisation Details</b>	Associate Director of Strategic/Large Projects Thakeham Homes
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<ul style="list-style-type: none"> <li>We support the inclusion of Policy SP7 which provides clear guidance on how the Council will seek to ensure the delivery of the necessary infrastructure to support new It is important that this approach is translated into the site allocations themselves, and the requirements for the developments, to ensure that the aspirations of Policy SP7 are delivered in practice.</li> <li>In addition to our comments regarding the overall Spatial Strategy and Housing Requirement, development at Berkhamsted, and the opportunity presented at Bulbourne Cross, we make a number of comments / objections regarding other draft policies within the emerging</li> </ul>

- In addition to our comments regarding the overall Spatial Strategy and Housing Requirement, development at Berkhamsted, and the opportunity presented at Bulbourne Cross, we make a number of comments / objections regarding other draft policies within the emerging
- The draft Local Plan states under Policy SP7 ‘Delivering Infrastructure’ Item 1 that “*All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal in order to:*
  - 1 *meet the needs arising from the development so as to avoid placing additional burden on the existing infrastructure;*
  - 1 *avoid or mitigate adverse social, economic and environmental impacts arising from the proposed development; and*
  - 1 *make good the loss or damage of social, economic and environmental assets arising from the proposed ”*
- As an infrastructure-led developer, Thakeham supports the delivery of new infrastructure to support growth within the Borough, especially alongside, or in advance of, new residential development. We are of the view that appropriate wording should be added to the policy to ensure infrastructure is provided as early as possible in the delivery of new

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS15536

<b>Person ID</b>	1271381
<b>Full Name</b>	Alison Walker
<b>Organisation Details</b>	Associate Director of Strategic/Large Projects Thakeham Homes
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<ul style="list-style-type: none"> <li>• Items 1 and 2 under Policy SP10 state that “<i>All development is required to mitigate and adapt to climate change and to actively pursue the reduction of carbon dioxide emissions.</i>” and “<i>The policy will be applied to ensure that all new development in the Borough is net zero by 2030.</i>”</li> <li>• We supported the Council’s decision to declare a climate change emergency in July 2019 and now support its commitment to undertaking action to make the Borough carbon neutral by 2030, 20 years before the Government’s Target.</li> <li>• Thakeham builds for the future, for communities and for individuals. Our approach sets us apart from our competitors. Thakeham delivers their schemes with a focus on sustainable development, looking ahead of current housing standards. Thakeham recognises fully the significance of climate change and is taking a highly proactive approach in responding to reducing carbon emissions. Thakeham has committed that by 2025, every Thakeham home will be Zero Carbon in lifetime operation</li> </ul>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15548
<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>Delivering Infrastructure to Support Growth Strategy comment</b>	<p><u>Policy SP7: Delivering Infrastructure</u></p> <ul style="list-style-type: none"> <li>Policy SP8 requires all new development to provide the necessary on site and off-site infrastructure requirements arising from the Whilst this is supported and considered a <b>sound</b> approach subject accordance in each case with the planning obligation “tests” set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and at paragraph 56 of the NPPF. We would encourage the Council to take advantage of development opportunities where existing infrastructure is already in place including by extensions of using uses. For example, our client’s site to the South of Castle Village offers the opportunity to capitalise on the existing infrastructure in this location.</li> </ul>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15576
<b>Person ID</b>	1271585
<b>Full Name</b>	Kim Harding
<b>Organisation Details</b>	Asset Protection Specialist Affinity Water Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	Our investment plans are highly regulated and set on a 5 year cycle. Our funding is based on this. These plans can be seen in our Water Resources Management Plan (also attached). Site based infrastructure is funded by developers.

The main issue for us in planning to supply water to new development is the uncertainty in implementation timeframes. We would like to see an **Integrated Water Management Statements** included as part of your Local Information Requirements (Validation). This would ensure that the developer approaches us in good time, and would go some way to help address any issues associated with having to supply developments at short notice.

The performance of our network has been assessed under 2 different scenarios:

- 1 Current demand – to establish the baseline
- 2 Future demand (including future developments in AW records and Dacorum sites listed in the table on slide 2&4). All developments are in place at the time specified.

All the assessed scenarios have been scaled to reflect peak summer demand conditions.

According to the simulation results:

- The demand increase due to **LP Reg 18 4 Dec - DRAFT LP Housing Growth Proposals** (domestic) will be approximately 5.45 MI/d (12,116 domestic units).
- The demand increase due to **LP Reg 18 8 Dec - DRAFT LP General Employment Areas** (only one site) will be approximately 0.12 MI/d.
- The pressures at the critical points in the network due to the new developments are such that major reinforcements in the network in the Dacorum area will be required. This normally means new pipelines although in some cases new pumping stations will also be required. There is sufficient water supply in the region. Transfer capacity and reservoirs balance would need to be studied.

All the proposed reinforcements will aim to recover the current level of service and the loss of capacity in the network due to the additional load imposed by all projected development.

Our current plan considers reinforcements to be installed in the following years, and the new infrastructure will be available for the initial housing planning that may be used to absorb some initial phases of total growth.

**However, the North Hemel is major development, and together with other big projects occurring in the area the overall scheme design and construction programme will depend on the location and phasing of these. This means our current plan may need to be reviewed due to the big increase of demand in the area. Any early**

**information concerning this (phasing domestic/employment demand and industrial use) will help our planning.**  
 This is subject to developers and customers reducing their PPC (*Per Capita Consumption*) according to our WRMP (*Water Resources Management Plan*) through the development of water-efficient buildings; and encouraging customers to save water.

Our WRMP can be viewed at the link below:

[https://www.affinitywater.co.uk/docs/Affinity\\_Water\\_Final\\_WRMP19\\_April\\_2020.pdf](https://www.affinitywater.co.uk/docs/Affinity_Water_Final_WRMP19_April_2020.pdf)

**Included files**

[Affinity\\_Water\\_Final\\_WRMP19\\_April\\_2020.pdf](#)  
[Dacorum allocated growth sites with employment assessment February 2021.pptx](#)

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS15639

**Person ID** 1271974

**Full Name** EMILY FORD

**Organisation Details** SENIOR PLANNER

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Delivering Infrastructure to Support Growth Strategy comment**

- We support DBC in seeking to deliver the infrastructure necessary to support growth and, therefore, support Policy SP7 in
- To be sound, it is important that Policy SP7 is consistent with national Specifically, the policy should be consistent with paragraphs 55 and 56 of the NPPF. Paragraph 55 states:
- Paragraph 56 states:

- 1 necessary to make the development acceptable in planning terms;
- 1 fairly and reasonably related in scale and kind to the

- Taking account of the above, we recommend that part 1 of Policy SP7 is amended as follows:

~~4. the necessary necessary to mitigate the impact of development requirements arising from the proposal in order to:~~

- 1 ~~meet the needs arising from the development so as to avoid placing additional burden on the existing infrastructure;~~

~~b. avoid or mitigate adverse social, economic and environmental impacts arising from the proposed development; and~~

- 1 ~~make good the loss or damage of social, economic and environmental assets arising from the proposed~~

- We note that an initial Infrastructure Delivery Plan has been published alongside the draft Local Plan which provides an early indication of the likely infrastructure required to support the proposed Local Plan We welcome this ongoing work which provides helpful clarity on the contributions towards infrastructure enhancements likely to be sought. We discuss the identified infrastructure requirements for Berkhamsted in Section 6 of these representations, acknowledging that these may be subject to change over time and as the supporting Local Plan evidence base evolves.
- The precise mechanism for securing infrastructure is being reviewed by DBC, with a Supplementary Planning Document (SPD) expected to be prepared to guide delivery and support the Local We support DBC in seeking to identify an appropriate mechanism to secure infrastructure delivery and would welcome the opportunity for further discussion with officers in this regard through the plan making process.
- Notwithstanding this, we request that sufficient flexibility is retained to account for scenarios where bespoke approaches are For example, consideration should be given to how infrastructure enhancements needed as a result of cumulative development on multiple growth areas can be funded proportionately and delivered without delaying individual development proposals being brought forward.

**Included files**

**Title** Delivering the Infrastructure to Support Growth

**ID** EGS15716

**Person ID** 1273151

<b>Full Name</b>	Ms Megan Green
<b>Organisation Details</b>	Senior Planner Thakeham Homes Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>The draft Local Plan states under Policy SP7 ‘Delivering Infrastructure’ Item 1 that</p> <p><i>“All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal in order to:</i></p> <ul style="list-style-type: none"> <li><i>1 meet the needs arising from the development so as to avoid placing additional burden on the existing infrastructure;</i></li> <li><i>1 avoid or mitigate adverse social, economic and environmental impacts arising from the proposed development; and</i></li> <li><i>1 make good the loss or damage of social, economic and environmental assets arising from the proposed development.”</i></li> </ul> <p>As an infrastructure-led developer, Thakeham supports the inclusion of Policy SP7 which provides clear guidance on how the Council will seek to ensure the delivery of the necessary infrastructure to support new developments. It is important that this approach is translated into the site allocations themselves, and the requirements for the developments, to ensure that the aspirations of Policy SP7 are delivered in practice. We suggest that appropriate wording should be added to the Policy to ensure infrastructure is provided as early as possible in the delivery of new communities.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15757
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>We note the comments in section 10 and <b>SP7 Delivering Infrastructure</b> SP7.3 references ‘timely and comprehensive manner to support new development.’</p> <p>We wish to avoid the scenario where the promised infrastructure is delayed and residents experience the resulting adverse impact. Accordingly, we consider a stronger statement is required that ensures provision is delivered ahead of the time when provision is regarded as overdue to meet the needs of the development.</p>
<b>Included files</b>	
<b>Title</b>	Delivering the Infrastructure to Support Growth
<b>ID</b>	EGS15775
<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	
<b>Delivering Infrastructure to Support Growth Strategy comment</b>	<p>Public Transport – in General</p> <p><b><i>What an operator would like, and many passengers.</i></b></p> <p>A service that goes directly from your origin to destination, with minimum stops, very fast, maximum loading.</p>

The challenge is getting all passengers in one place in the first place. So most public transport ends up with a lot more stops and uneven loads.

Most railways were laid out before the houses, so tend to fit this description. It is not easy to move railways. There is a problem though, when planner and developers build houses a long way from stations which makes the train less attractive. There is still the stopping pattern problem i.e. too many stops makes the journey slow and unattractive.

Buses have a different problem. When we layout housing estates, we do not think about the bus services. So, they often have to follow the road network, which can make the route structure inefficient. To make a route viable, it must cover many houses, but this often means the route must go “round the houses” a long and winding route, with many stops and lots of detours. The resultant journey is so slow, many people shun the bus and use the car.

So, we need to design new housing estates with a road layout which encourages bus, tram and train use.

When creating new housing, the residents need new services, such as Schools, Health care (doctors and hospitals) and shops, not just transport. There are some key differences though. The other services can be retrofitted to a housing estate. Good public transport must be designed in from the start. For all other services, you need transport to get to them. So, must be designed with transport in mind.

### **New Developments and Transport**

When choosing where to live we have to consider a number of factors, many of them are determined by transport.

- A large proportion of households have two adults working. If they are working, they need to get to
- If the house is for a family with children, in most cases they will need to get to school. Often they will be at the same school, but not always.
- The size and cost of house can affect the type of transport needed. Can a house be afforded on 3 times average local wages? Possibly with 2 adults working this could be higher. If they cost more than this, then at least one adult will be traveling a longer distance to a higher paying job. This could be by train to London or by car somewhere else. If they use the train, they will need to get to the station from their house.

If the house is within a mile of the station on the flat, then walking is easy and can be assumed. If it is further away or up a hill walking will be less attractive. Over a mile or with a steep hill then walking will not be common. Some people will cycle, providing there is secure storage at the station.

There is a challenge with a bus, as you need the bus to connect with the train. Sufficient time must be allowed, to get from one, to the other. Time must be allowed in case one is late. But if it is too long it adds to the overall journey time. This makes public transport less attractive.

When public transport is attractive many people will choose it over the car. But when public transport is too slow, unreliable or undependable people will revert to their cars. In most cases where people have the resources to buy a house, they will also have the choice of using a car. The car will be the default option if the alternatives are not designed to be attractive.

For each household, one adult will create 1 return trip from home to work. For each school visited it could result in 2 return trips a day if in a car.

The question is which mode of transport will be used. This must be planned in when the house is built. Is it practical (safe, secure and easy) for a child to walk or cycle to school? If not then then they will normally end up in a car.

Other journeys will also be undertaken by households; however, this paper focuses on the journeys that happen daily and will therefore cause the highest volume of traffic.

Therefore, it should be mandatory for all housing development to have a transport plan to address where the people who live in the houses will; work, go to school etc. Then determine how they will get there, then how the existing and planned new infrastructure will handle it. If this plan is inadequate the proposal should be rejected. It should also address wider issues such as climate change i.e. the carbon produced by the transport, should be included in the carbon budget for the development as a whole.

**Included files**

# 11 Neighbourhood Planning Report responses

<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS26
<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	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS46
<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>Neighbourhood Planning Strategy comment</b>	Within this subject I see the phrases <i>“to allow communities to develop-- for the community to have a significant say in its location and specification-- for communities to shape their local neighbourhoods-- We have and will continue to take an active role in advising and supporting the community in the neighbourhood planning process, wherever possible, by sharing evidence and information and ensuring the neighbourhood plan fits with our strategic policies”</i> Yet who are the communities? Are these local residents within that community who will have a positive input into the strategy plan and will be listened to. I am an active member of my local Neighbour Hood Action body. I can assure you with a lot of the local development we have had no say in any of these, yet alone any consultation. Regarding Policy SP8 there is no mention of any community representation, yet alone input.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS146
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS254
<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>Neighbourhood Planning Strategy comment</b>	Neighbourhood plans should be allowed to degenerate in "not in my backyard" opposition to development.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS278
<b>Person ID</b>	1258944
<b>Full Name</b>	Colin Sturges
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Neighbourhood Planning Strategy comment</b>	Apologies if I've missed it but where's the rule that states how much <i>new</i> green space must be created/provided <i>within</i> each hectare of our new jeek-by-jowl housing?
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS308
<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>	

Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS369
<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
Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS507
<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>	

Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS598
<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>	
Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS627
<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

**Neighbourhood Planning Strategy comment**

Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.

My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.

The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.

Tring is a commuter town and a (significant) proportion of new inhabitants will likely commute to London on a trainline already at capacity. Station car parks are full before rush hour is over - where is the proposal to increase that capacity? You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by such radical numbers will result in far more congestion and pollution – flying directly in the face of your environment plan. It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.

Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between properties, minimal parking and a minimal green space. Once they have been paid, they will leave and having irreparably changed the face of the town, we, and future generations will be left to suffer the consequences.

These new estates seen all over the country are the modern equivalent of tower blocks build in the 60s. We will look back in 50 years and wonder why anyone thought they were a good idea. The example to the west of Tring is a key demonstration of this. Decorating the house that face the main road with a pretty stone façade is just that, a façade. Look within the roads and you see narrow houses, squashed in at the edge of town, forcing people to drive to town. Maximising profits for developers, ignoring the real needs of the town inhabitants.

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

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

**Included files**

**Title** Neighbourhood Planning

**ID** EGS712

**Person ID** 1261251

**Full Name** Lesley Ashden

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Neighbourhood Planning Strategy comment**

**Included files**

**Title** Neighbourhood Planning

**ID** EGS731

**Person ID** 1261250

**Full Name** Christina Thompson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

<b>Yes / No</b> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS744
<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>Neighbourhood Planning Strategy comment</b>	The neighbourhood planning strategy is simply a case of being told what the targets are and then "make the best of what is given". How can communities truly buy into this process when the government has taken such a dictatorial approach to the targets set for each council and Dacorum council is clearly not going to change its proposals for each new designation. Tring in particular has a mountain to climb to create a "community plan" when the town will double in size. This is not a community today so will be even less so in future.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS875
<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	Yes
<b>Neighbourhood Planning Strategy comment</b>	It is good to see DBC supports Neighbourhood Plans. I hope this translates into a closer working relationship with the NP groups in Bovington and Kings Langley, to ensure the best for those communities.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS988
<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>Neighbourhood Planning Strategy comment</b>	rather than communities shaping their local neighbourhoods, Northchurch will just become a sprawling mass tagged on to the edge of Berkhamsted, and lose it's quality of life . Can you guarantee that Hertfordshire CC will spend what is needed on new roads, more entries to the A41, and widen and maintain the A roads, let alone the single lane B roads that no one maintains?  There has already been the death of a child recently on the High Street, and the bulk of traffic increases yearly before any extra housing.  11.6 Again, it bears stating - you have got your figures wrong according to the most recent government calculations
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1173
<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>Neighbourhood Planning Strategy comment</b>	SP8 I support Community lead Neighbourhood Planning and associated right to Self Build.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1195
<b>Person ID</b>	1261840
<b>Full Name</b>	Rachel Heath
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1236
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1264
<b>Person ID</b>	1261930
<b>Full Name</b>	Chris Gee
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Neighbourhood Planning Strategy comment</b>	<p>The principle of new housing is accepted as more people live alone and with the natural flow of additional demand needed in the south east. Nonetheless Dacorum has two unique historic market towns in Berkhamsted and Tring, and one larger significant village in Kings Langley. By concentrating much of the new dwellings around these communities will diminish their special historic character and forever alter their unique value in the borough. No allowance for this cultural loss seems to have been recognised or attempted to be protected.</p> <p>Large new plots of dwellings and estates will create distorted communities that will not be cohesive and fail to integrate. The Dacorum plan appears not to have addressed the aesthetic appeal of these historical market towns, which will feel and look dis-jointed, with large, modern housing estates out of keeping with the historical identities they currently have. An alternative option would be for smaller scale developments around the towns, lessening the wholesale impact, coupled with a broader spread of smaller developments attached to the other villages within the borough.</p>

<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1329
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1499
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1635
<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> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1809
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	

<b>Title</b>	Neighbourhood Planning
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<b>ID</b>	EGS1914
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS1975
<b>Person ID</b>	1262618
<b>Full Name</b>	Jasmine Jenkins
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2006

<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>Neighbourhood Planning Strategy comment</b>	In terms of neighbourhood, Northchurch is a village and not West Berkhamsted as identified in the plan. It is defined as a village in its own right and predates Berkhamsted. some two miles form Berkhamsted Town Centre it is a very different neighbourhood
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2041
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2054

<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> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2090
<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>Neighbourhood Planning Strategy comment</b>	Neighbourhood Planning Strategy. Please see next comment
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2128
<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>Neighbourhood Planning Strategy comment</b>	I have no idea what this means to be honest and looks highly complicated to manage
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2196
<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>Neighbourhood Planning Strategy comment</b>	As I have expressed in my other answers, the indicative figures for Kings Langley are way too high given that is an historic village in the green belt. Therefore, I would encourage Kings Langley parish council to see the figures therein contained as an absolute maximum.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2274
<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> * Yes * No	Yes
<b>Neighbourhood Planning Strategy comment</b>	<p>The need for new housing is accepted, as more people live alone. Nonetheless, Dacorum has two unique historic market towns in Tring and Berkhamsted, as well as the significant village of Kings Langley. Unfortunately, the new dwellings seem to be concentrated around these communities, particularly Tring, and this will diminish their special historic character, and for ever alter their outstanding value in the Borough. There is no evidence that allowance for this cultural loss has been recognised, let alone protected.</p> <p>Large blocks of new dwellings and estates will create distorted communities that will not be cohesive. One particular site, to which I will refer later, will effectively cut Tring into two communities.</p> <p>The Dacorum plan seems not to have addressed the appeal of these historic market towns, with large modern housing estates at odds with the historical identities they currently enjoy.</p> <p>An alternative option would be for smaller-scale developments around the towns, particularly Hemel Hempstead, which has the infrastructure to cope, coupled with a broader spread of smaller developments attached to other villages within the Borough.</p>
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2288
<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>	

Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2322
<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>	
Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2376
<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>	
Yes / No	No

* Yes	
* No	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2401
<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>Neighbourhood Planning Strategy comment</b>	There is a flaw in neighbourhood planning where settlements are at boundaries of different neighbourhood or parish plans. For example Bourne End lies in more than one neighbourhood. Bovingdon's parish plan saw Bourne End as "out of sight, out of mind" in its consideration of its neighbourhood plan. East Berkhamsted was surprised to find that it too includes parts of Bourne End, which is a series of hamlets that have seen three planning permissions granted for car based developments nearly doubling the size of the community without any improvement in local amenity infrastructure.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2412
<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>Neighbourhood Planning Strategy comment</b>	My major worry is the <b>Hemel</b> Garden Community project. This is built entirely on important green belt land. It seems to be that although it is too far from any existing infrastructure like rail links it is the 'easy' option to stick a massive housing estate on a green field with 5,000 houses and job done. The plan includes the creation of green spaces. Why? You have destroyed green belt land to create a green space. It doesn't make sense.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2458
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2531
<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> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2597
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2736
<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> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2769
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2792
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Neighbourhood Planning Strategy comment</b>	The concept of a Neighbourhood Plan that residents are able to comment on and express their views is a good one, but not until the Local Plan housing requirement figures are recalculated based on reliable up to date data; all required assessments and Screening Reports are completed; consultations with the County Council on need for additional school places is carried out and published; and finally, and most importantly, Green Belt site proposed release is reviewed and reduced dramatically in the Local Plan.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2857
<b>Person ID</b>	1012318
<b>Full Name</b>	Mrs Jane Hennell
<b>Organisation Details</b>	Area Planner Canal and River Trust
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * <b>Yes</b> * <b>No</b>	Yes
<b>Neighbourhood Planning Strategy comment</b>	The Canal & River Trust ask that those creating Neighbourhood Plan undertake early engagement with stakeholders and that this should include the Canal & River Trust where a proposed NP area includes or is adjacent the Grand Union Canal. The Trust has written a document to help in the Neighbourhood Plan process which has been uploaded and can also be viewed on the Trusts' website here
<b>Included files</b>	<a href="#">Planning-for-waterways-in-neighbourhood-plans.pdf</a>
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2873
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS2925
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3090
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3220
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3345
<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 * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3376
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3401
<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>Neighbourhood Planning Strategy comment</b>	No Comment
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3421
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3466
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3503
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3546
<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	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3559
<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>Neighbourhood Planning Strategy comment</b>	We note with interest that The Plan considers Neighbourhood Development Plans will play an increasingly important role in shaping growth in Dacorum's rural areas in the future. Tring Rural Parish Council will give serious consideration to producing an NDP or site-specific Community Right to Build Order/s (Localism Act 2011). We believe that Neighbourhood Development Orders, Village Design Statements, Assets of Community Value and Parish Plans should be encouraged in parishes, thereby ensuring that future development in rural communities is appropriate to the location and encourages sustainability.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3579
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3600
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3680
<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>Neighbourhood Planning Strategy comment</b>	If people (voters and taxpayers!) tell you they don't want the greenbelt destroyed, why aren't you listening?
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3702
<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>Neighbourhood Planning Strategy comment</b>	Outdated, houses not needed and destroying the green belt is not the right way to do it
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3722
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3810
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>Neighbourhood Planning Strategy comment</b>	I disagree with the statement that Neighbourhood plans have to be in general conformity with the policies contained within this strategy. There is no point to them if that is the case as they would simply endorse existing DBC strategies.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3860
<b>Person ID</b>	1263982
<b>Full Name</b>	Lisa York
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3935
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS3967
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Neighbourhood Planning Strategy comment</b>	Neighbourhood plans should not be forced to comply with the Local Plan. Whilst the policy should encourage following the principles, the nature of neighbourhood input is that they are perhaps more sensitive to the local needs and drivers. The policy should reflect this.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4098
<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>Neighbourhood Planning Strategy comment</b>	The idea of a neighbourhood plan involving consultation and ensuring buy in from the local community is laudable. However this has not been achieved in this current draft local plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This probably disenfranchises more elderly sectors of the population, those who do not have access easy to the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4132
<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>Neighbourhood Planning Strategy comment</b>	You do not even recognise Northchurch as a settlement. Would we be entitled to make a neighbourhood plan? I very much hope you are listening to our views in this consultation process.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4200
<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>Neighbourhood Planning Strategy 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>Any development that does take place <b>MUST</b> include wide green pedestrian access ways avoiding the previous mistakes of allowing dark, gloomy, narrow, high sided, dank, unpleasant and, ultimately unsafe, footpaths through new build estates.</p>

Access to the countryside is key - by building up to the A41 in Berkhamsted there is nowhere to go. Except that there are beautiful fields with truncated footpaths on the other side of the dual carriageway. HCC have recently removed the "at grade" crossings for safety reasons - the IDP must include at least one and possibly two footbridges to provide good access to green spaces.

**Included files**

**Title** Neighbourhood Planning

**ID** EGS4202

**Person ID** 1264301

**Full Name** James Stringer

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Neighbourhood Planning Strategy comment**

**Included files**

**Title** Neighbourhood Planning

**ID** EGS4287

**Person ID** 1264321

**Full Name** David` Fox

**Organisation Details** personal

**Agent ID** 1264318

**Agent Name** David  
Fox

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Neighbourhood Planning Strategy comment</b>	The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular, those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This disenfranchises probably more elderly sectors of the population, those who do not have easy access to the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion and will therefore not achieve buy in as a neighbourhood plan.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4312
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4417
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4453
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4511
<b>Person ID</b>	1264374
<b>Full Name</b>	Belinda Hunt
<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>Neighbourhood Planning Strategy comment</b>	<p>Too much neighbourhood planning in Buckinghamshire has been based on powerful individuals in local areas making choices based on where they live remaining unaffected. This has meant poor decisions affecting transport, sewerage, conservation and heritage and safety on roads close to village schools.</p> <p>Neighbourhood plans need to be delivered according to improving local life whilst protecting wildlife, heritage and serving apt infrastructure.</p>
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4524
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Neighbourhood Planning Strategy 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. 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** Neighbourhood Planning

**ID** EGS4576

**Person ID** 1145918

**Full Name** Mr Richard Tregoning

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Neighbourhood Planning Strategy comment**

**Included files**

**Title** Neighbourhood Planning

**ID** EGS4624

**Person ID** 1263004

**Full Name** Jill Townsend

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Neighbourhood Planning Strategy comment</b>	<p>What a joke. Talk of setting up new 'made' neighbourhood plans yet DBC fails to recognise the existing ancient village of Northchurch calling it West Berkhamsted.</p> <p>I suggest that this is for convenience as villages such as Aldbury and Potten End are excluded from the ravages of these plans. Had Northchurch been recognised as the village it is then the land that DBC is prepared to steal from Green Belt would, by DBC's own definition be protected?</p>
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4671
<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>	No
* Yes	
* No	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4797
<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	
<b>Neighbourhood Planning Strategy comment</b>	Too many green field and green belt sites are identified for housing.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4861
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4864
<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> * <b>Yes</b> * <b>No</b>	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4963
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Neighbourhood Planning Strategy comment</b>	The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular, those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This disenfranchises probably more elderly sectors of the population, those who do not have easy access to the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion and will not achieve buy in as a neighbourhood plan.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS4971
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5048
<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>Neighbourhood Planning Strategy comment</b>	Neighbourhood planning ought to take place before development, not after it. In any case it appears that rather than listen to what residents of any given neighbourhood want, you intend that the plans should be there to deliver what YOU want. This is highly objectionable and undemocratic.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5068
<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>	
<b>Yes / No</b> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5099
<b>Person ID</b>	1264555
<b>Full Name</b>	Rick 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>Neighbourhood Planning Strategy comment</b>	DBC need to accept responsibility for representing and enforcing a neighbourhood plan whilst it is in construction. Communities that have contributed to neighbourhood plans and have been genuinely under the impression that these have been adopted have been shocked to find that developers have ignored these, and the Borough council has sided with the developers on the basis that local councils have been misinformed that the plan was adopted. Public confidence in the concept of a neighbourhood plan is so low that it would be difficult to inspire residents to contribute to one.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5100
<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>Neighbourhood Planning Strategy comment</b>	How do you distinguish between Neighbourhood Planning that has real buy-in from the majority of local people and represents a true shared vision, from a set of developers who have managed to get a small number of community representatives on their side by offering some form of facility or asset gain as part of the development? Our experience in Berkhamsted so far is that this Neighbourhood Planning approach is at significant risk of misuse.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5156
<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>Neighbourhood Planning Strategy comment</b>	The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular, those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This disenfranchises probably more elderly sectors of the population, those who do not have easy access to the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion and will not achieve buy in as a neighbourhood plan.

<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5189
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5208
<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>Neighbourhood Planning Strategy comment</b>	I am concerned that part of the point of Neighbourhood Plans seems to be to try to force the local residents to accept the idea of building on nearby Green Belt land.

I also feel that there can be insufficient local awareness of the proposals made in Neighbourhood Plans. I live in Grovehill, but I wasn't really aware of the Marchmont Farm housing scheme proposals until today when point 11.7 caused me to look into it. I recall seeing a lengthy Neighbourhood Plan document at some point, but most people don't have the time or desire to study lengthy documents in detail. It would have been helpful to have been given a clear and brief summary centred around a map.

**Included files**

**Title** Neighbourhood Planning

**ID** EGS5214

**Person ID** 1264608

**Full Name** Nicola Beadle

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Neighbourhood Planning Strategy comment** The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular, those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This disenfranchises probably more elderly sectors of the population, those who do not have easy access to the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion and will not achieve buy in as a neighbourhood plan.

**Included files**

**Title** Neighbourhood Planning

**ID** EGS5281

**Person ID** 1264532

**Full Name** Robert Clarke

<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5288
<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>Neighbourhood Planning Strategy comment</b>	11.2 for the community to have a significant say. The car park in lower kings road was strongly contested and was considered not a viable site or proposition, but where DBC have flogged the concept/proposal it was pushed through the same was so of Barerock.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5328
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5357
<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 * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5403
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5411
<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 * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5422
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5466
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5604
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5622
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5635
<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>	

Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5745
<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>	
Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5765
<b>Person ID</b>	1264460
<b>Full Name</b>	Jonathan Nicholls
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b>	No

* Yes	
* No	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5809
<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>Neighbourhood Planning Strategy comment</b>	<p>Where to start? It's absolute junk.</p> <p>Supposedly allowing 'the potential to allow communities to develop a shared vision to shape their neighbourhoods' these proposals are a fig leaf for the abuse of local democracy.</p> <p>When you ask residents of Tring or Berkhamsted, the two communities I know well, whether they want such huge housing developments as you are proposing to be built on green field sites surrounding their towns, I doubt I have heard one in ten offer any support for the proposals. The rest are against, many vehemently.</p> <p>Your neighbourhood plans do accommodate ' developers and service providers' just not the people who live in the neighbourhood....</p>
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5833
<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	Yes
<b>Neighbourhood Planning Strategy comment</b>	Dacorum should publish the evidence that steers policy into re-classification of greenbelt land as th eonly solution to population growth.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5851
<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>Neighbourhood Planning Strategy comment</b>	I have little faith in DBC when it comes to Neighbourhood Planning and refer to this Local Plan as evidence. If the Neighbourhood was consulted and involved the Local Plan would look much different. It is not democracy in action I am sad to say.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS5880
<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>Neighbourhood Planning Strategy comment</b>	The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular, those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This disenfranchises probably more elderly sectors of the population, those who do not have easy access to the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion and will not achieve buy in as a neighbourhood plan.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6071
<b>Person ID</b>	1145998
<b>Full Name</b>	Mrs Pauline 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>Neighbourhood Planning Strategy comment</b>	This document seems to ignore Boxmoor. I have spent many hours at council lead Planning meetings for the Boxmoor/ Two Water/ Station area which are a very good idea.
<b>Included files</b>	

<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6090
<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>Neighbourhood Planning Strategy comment</b>	The planning appears to be around the new neighbourhoods but not how the character of the existing neighbourhood is going to be kept.
<b>Included files</b>	

<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6186
<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> * Yes * No	Yes
<b>Neighbourhood Planning Strategy comment</b>	The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. This consultation period finishing during the height of a pandemic has removed the opportunity for large sectors of the population to contribute. In particular, those with fewer computer skills - this portal is difficult to use (I had several false starts and like to think myself computer literate). This disenfranchises probably more elderly sectors of the population, those who do not have easy access to

the internet, or do not speak English as their first language. It is therefore not a valid representation of local opinion and will not achieve buy in as a neighbourhood plan.

**Included files**

**Title** Neighbourhood Planning

**ID** EGS6201

**Person ID** 1264030

**Full Name** Sean Collier

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Neighbourhood Planning Strategy comment**

**Included files**

**Title** Neighbourhood Planning

**ID** EGS6212

**Person ID** 1261819

**Full Name** Alex Rathmell

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6241
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6252
<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>Neighbourhood Planning Strategy comment</b>	Neighbourhoods have a problem at their frontiers especially as regards development and transport. Some communities find themselves sitting in more than one neighbourhood plan and feel bullied by the larger one on their doorstep. For example the Bovingdon Neighbourhood plan covers a small part of the Bourne End Community but regards development in Bourne End as "out of sight, out of mind" (this is a quote from the Bovingdon Neighbourhood Planning Committee to which Bourne End sent representatives).
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6363
<b>Person ID</b>	1264944
<b>Full Name</b>	Anna Sewerniak
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Neighbourhood Planning Strategy 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>

Traffic increase, due to these developments, will cause air pollution, congestion and do serious harm to Tring's inhabitants. 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.

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.

<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6369
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6411
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6456
<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> * <b>Yes</b> * <b>No</b>	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6472
<b>Person ID</b>	1264977
<b>Full Name</b>	E Ling
<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>Neighbourhood Planning Strategy 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>

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<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6566
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6573
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6579
<b>Person ID</b>	1265011
<b>Full Name</b>	Rebecca Staples
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	

<b>Yes / No</b> * Yes * No	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6582
<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 * No	Yes
<b>Neighbourhood Planning Strategy comment</b>	My neighbourhood, Adeyfield, will be changed from a suburban place where you meet many neighbours walking your dog in the parks to a more built-up inner city area by the loss of green space. More thought also needs to go into local resources, air quality and transport needs.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6683
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6689
<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>Neighbourhood Planning Strategy comment</b>	I endorse the response of the chiltern countryside group
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6763
<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	
* No	
<b>Neighbourhood Planning Strategy 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>This doesn't seem like a plan to provide a framework for communities to shape their local neighbourhood; more like railroad the locals into submission. The small villages get to stay small so perhaps that's where the proposers live.</p>
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6768
<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>	No
* Yes	
* No	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6878
<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	
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6879
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6892
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6954
<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>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS6998
<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>Neighbourhood Planning Strategy comment</b>	apart from this form residents in wingrave road that border the supposed developments in tring have had no say or consultation into what these new developments should look like.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS7004
<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>Neighbourhood Planning Strategy comment</b>	I support the concept of neighbourhood plans but will the residents of the neighbourhood have a real say? Or will their views be overlooked. The Neighbourhood concept incorporated in the Hemel new town development was excellent. Revisit the design features of the 1950's...look at how Adeyfield, Bennetts end ,Chaulden etc were fantastically planned to suit their residents.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS7044
<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> * Yes * No	Yes
<b>Neighbourhood Planning Strategy comment</b>	Too late to elaborate.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS7110
<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>Neighbourhood Planning Strategy comment</b>	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS7192
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS7232
<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	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS7269
<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>	

Yes / No * Yes * No	No
<b>Neighbourhood Planning Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS9673
<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>	
Yes / No * Yes * No	
<b>Neighbourhood Planning Strategy comment</b>	<b>Chapter 11</b> , and SP8 'c' on Neighbourhood Planning, should also be reconsidered in the light of the latest available information and evidence, not just that published by the Council.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS11426
<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>	
Yes / No	

* Yes	
* No	
<b>Neighbourhood Planning Strategy comment</b>	1 <b>Neighbourhood Planning</b> When Bourne End looked at producing a village plan a few years ago, it was too daunting a task for a small community of about 130 homes. This will change when current developments are complete adding 116 houses (Yes, a virtual doubling in size)
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS12122
<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>Neighbourhood Planning Strategy comment</b>	1 <b>Neighbourhood Planning</b> <b>Policy SP8 – Neighbourhood Planning</b> No Objections
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS12318
<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>Neighbourhood Planning Strategy 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>	Neighbourhood Planning
<b>ID</b>	EGS12875
<b>Person ID</b>	1207443
<b>Full Name</b>	Mrs Jennifer Bissmire
<b>Organisation Details</b>	Clerk Markyate Parish Council
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	
<b>Neighbourhood Planning Strategy comment</b>	Markyate Parish Council has not attempted to produce a Neighbourhood Plan. We produced a Parish Plan based on a census, not a sample of the population, and included questions which will still have some meaningful results despite the age of the work. The necessary community involvement would be very difficult to recruit given the time commitment involved and the current Covid restrictions make any such consultation impractical.
<b>Included files</b>	
<b>Title</b>	Neighbourhood Planning
<b>ID</b>	EGS15475
<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>Neighbourhood Planning Strategy comment</b>	SEE ATTACHED RESP
<b>Included files</b>	

# 12 Monitoring Review responses

<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS47
<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>Monitoring and Review Strategy comment</b>	I would have thought that a quarterly review at the start of a policy would be more prudent to monitor any early issues so any familiar trends could be alleviated and captured for program analyst. Then ,if the trend is positive, reduce the review over a set period of the policy
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS198
<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>Monitoring and Review Strategy comment</b>	The provision of full details on the 2017 consultation have been totally inadequate; they were only fully released at the same time as the new consultation, after three years of being kept out of sight to even t9 elected Councillors. Ther are almost 200,000 pages in the main report - how can anyone be supposed to find the previously recorded detail - even Councillors have not read the report.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS255
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS289
<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	Yes

* No	
<b>Monitoring and Review Strategy comment</b>	This feels a bit thin and weak. I monitor and review my shopping list each week, but the important thing is to take action. Would like to see some indication here of how the local plan will be actually used to drive individual planning decisions, how this use will be monitored and deviations alerted and actioned.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS309
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS347
<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	Yes

* No	
<b>Monitoring and Review Strategy comment</b>	This policy seems to place meeting housing demand above and beyond any of the other aspects of the local plan which one would assume would need monitoring. Is this simply a vehicle to increase housing demand?
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS370
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS600
<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

* No	
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS628
<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	
<b>Monitoring and Review Strategy 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.</p>

It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.

Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between properties, minimal parking and a minimal green space. Once they have been paid, they will leave and having irreparably changed the face of the town, we, and future generations will be left to suffer the consequences.

These new estates seen all over the country are the modern equivalent of tower blocks build in the 60s. We will look back in 50 years and wonder why anyone thought they were a good idea. The example to the west of Tring is a key demonstration of this. Decorating the house that face the main road with a pretty stone façade is just that, a façade. Look within the roads and you see narrow houses, squashed in at the edge of town, forcing people to drive to town. Maximising profits for developers, ignoring the real needs of the town inhabitants.

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

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

**Included files**

**Title** Monitoring and Review

**ID** EGS732

**Person ID** 1261250

**Full Name** Christina Thompson

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

* Yes	
* No	
<b>Monitoring and Review Strategy comment</b>	The monitoring needs to assess the viability of delivering the plan on a regular basis
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS746
<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>	No
* Yes	
* No	
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS876
<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>	No
* Yes	

* No	
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS990
<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>Monitoring and Review Strategy comment</b>	<p>You state that you will keep up to date with relevant and current plans, but the worry is that Taylor Wimpey are exerting undue pressure on you to realise their ambition of finally utilising land which they have owned for many years, regardless of the residents' opinions.</p> <p>The figures are changing, not yet clear, and you should not be surging ahead with faulty facts.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1174
<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>Monitoring and Review Strategy comment</b>	SP9 I support monitoring and ask if local Parish Councils will have a role in reporting.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1196
<b>Person ID</b>	1261840
<b>Full Name</b>	Rachel Heath
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1237
<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>	No

* Yes	
* No	
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1330
<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>	No
* Yes	
* No	
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1472
<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
* Yes	

* No	
<b>Monitoring and Review Strategy comment</b>	<p>This is concerning. That the Plan is still open to considering additional sites to enable the housing target to be acheived.</p> <p>This will then further compromise local communities, the character of small towns, its infrastructure, the AONB &amp; greenbelt land, job opportunities, amenable land for leisure, green spaces and the health and wellbeing of the environment.</p> <p>In particular, its extremely concerning that developers will have free reign over where they develop. This is without proper and fair public consultation.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1500
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1636
<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> * Yes * No	
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1810
<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>Monitoring and Review Strategy comment</b>	The policy in SP9 is focused on monitoring and reviewing the rates of delivery. There are no policies that help ensure that developers deliver in accordance with the masterplans that gained them permissions.  DBC along with many councils have an awful record of holding developers to masterplans agreed by them and local communities.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS1915
<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>Monitoring and Review Strategy comment</b>	See my earlier comments.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2008
<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>Monitoring and Review Strategy comment</b>	<p>Monitoring and review strategy appears focussed on build rate not being achieved locally or nearby rather than the aims. Where is the evaluation of ensuring build is still needed, that it recognises if the economy is not vibrant, and that it can measure whether the residents of Dacorum feel happier and healthier as a result of DBC's efforts?</p> <p>Monitoring and review needs to look at outputs, outcomes for Dacorum residents and provide the opportunity to reassess. The benefits in this strategy are not identified in terms of the DBC resident.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2020
<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>Monitoring and Review Strategy comment</b>	12.1 This process of review must involve local people and enable them to feed back the effectiveness or otherwise of DBC's plans. Unfortunately I have no confidence that it will be any more accessible to residents than the current consultation process which has effectively barred anyone who does not have access to the internet or the IT skills from participation. I only heard of this process by word of mouth.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2055
<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> * Yes * No	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2089
<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>Monitoring and Review Strategy comment</b>	Monitoring and Review Strategy. I don't have confidence in neighbourhood plans. Green belt was put in place for a reason and now we are building on it. From what I can see plans will be changed to suite whatever council is in place and capital gain rather than considering people's health and well-being and the environment we live in, have we learnt nothing from all the climate change issues of late.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2129
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2290
<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>Monitoring and Review Strategy comment</b>	Policy SP9 is focused on monitoring and reviewing the rates of delivery. There are no policies that help ensure that developers deliver in accordance with the masterplans that granted them permissions. DBC have a derisive record of holding developers to masterplans agreed by them and local communities.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2323
<b>Person ID</b>	1261830
<b>Full Name</b>	alister budd
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2377

<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2406
<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>Monitoring and Review Strategy comment</b>	Monitoring and review will reveal what we already know that policies tend to contradict each other and planning in particular is no respecter of local or national policy but takes a pragmatic view of how much it will cost to hold developers to policy and conditions on permission. Some plans are not worth the paper they are written on (including the electronic analogy)
<b>Included files</b>	
<b>Title</b>	Monitoring and Review

<b>ID</b>	EGS2413
<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>Monitoring and Review Strategy comment</b>	Ha Ha, Does it matter if the figures are up to date if the targets are set by 2014 figures. The traffic figures haven't been done yet. So I'm sure they will be fine. But you do have to laugh at the question.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2598
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review

<b>ID</b>	EGS2628
<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> * Yes * No	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2737
<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> * Yes * No	Yes
<b>Monitoring and Review Strategy comment</b>	Monitoring and Review Policy does not make clear what sy the residents have in this review.  How will the views of the residents be taken into account.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review

<b>ID</b>	EGS2770
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS2793
<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>Monitoring and Review Strategy comment</b>	<p>This should include environmental and build monitoring of developers to ensure they deliver what is expected of them, including</p> <p>a) adherence to any Hedge Retention or Tree Preservation Orders,</p> <p>b) that necessary measures have been implemented to support vulnerable and protected species and habitats and not just to mitigate damage</p> <p>c) Net biodiversity gains are delivered or deliverable in the short term (ie 5 years not 30!).</p>

d) construction of an appropriate quantity and mix of affordable houses has occurred within a reasonable time scale  
e) infrastructure is provided in good time and to the standard required

**Included files**

**Title** Monitoring and Review

**ID** EGS2874

**Person ID** 1263425

**Full Name** Andrew Farrow

**Organisation Details** Nettleden with Potten End Parish Council

**Agent ID** 1253616

**Agent Name** Andrew  
Farrow

**Agent Organisation**

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

**Monitoring and Review  
Strategy comment**

**Included files**

**Title** Monitoring and Review

**ID** EGS2926

**Person ID** 1263377

**Full Name** Jane Messenger

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3092
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3221
<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	No

<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3269
<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>Monitoring and Review Strategy comment</b>	I see no policies that will ensure that the developers stick to the master plan. Developers are notorious for using artistic license while DBC have a weak record for holding developers to account, Townsend Gate development, Lodge knocked down being just one very recent example.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3346
<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 * No	No

<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3377
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3403
<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>Monitoring and Review Strategy comment</b>	No Comment
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3424
<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>Monitoring and Review Strategy comment</b>	Policy SP9 is focused on monitoring and reviewing the rates of delivery. There are no policies that help ensure that developers deliver in accordance with the masterplans that granted them permissions. DBC have a derisive record of holding developers to masterplans agreed by them and local communities.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3468
<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>Monitoring and Review Strategy comment</b>	Some sort of monitoring is, essential, given it appeared to be so lacking in the implementation of the core strategy, it was possible for a Masterplan for a major site (SS1) to, mysteriously, not be presented to Cabinet for approval - thence giving the Developer free reign to ignore its proposals.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3569
<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	
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3580
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3601
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3683
<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	No

<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3703
<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>Monitoring and Review Strategy comment</b>	Outdated, houses not needed and destroying the green belt is not the right way to do it
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3724
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3814
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>Monitoring and Review Strategy comment</b>	Any basic monitoring of this plan indicates that it is now irrelevant because of change to Government guidance in November 2020, Pandemic and longer term changes in shopping patterns over the last 5-10 years. This plan should now be abandoned.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3861
<b>Person ID</b>	1263982
<b>Full Name</b>	Lisa York
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No

<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3936
<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>Monitoring and Review Strategy comment</b>	A new review needs to happen now in relation to the pandemic and the number of houses really needed, and the objections of the town to such a large increase in housing.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS3969
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4099
<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 * No	Yes
<b>Monitoring and Review Strategy comment</b>	please ensure that commitments to affordable housing and support infrastructure in particular are kept on track by developers rather than just the profitable new housing
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4135
<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>Monitoring and Review Strategy comment</b>	I support the One Voice Alliance views and hope DBC will take the opportunity of the review process to take account of post pandemic changes and make the relevant amendments to the Plan
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4203
<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>Monitoring and Review Strategy comment</b>	The plan is already in need of review given the mismatch with ONS population growth estimates and the change in national and local circumstances caused by the pandemic and Brexit.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4258
<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>Monitoring and Review Strategy comment</b>	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.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4289
<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>Monitoring and Review Strategy comment</b>	Please ensure that commitments to affordable housing and support infrastructure in particular are kept on track by developers rather than just the profitable new housing.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4314
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4454
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4506
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Monitoring and Review Strategy comment</b>	Does this mean that the new plan/algorithm promised by the government will be used to review these plans?
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4525
<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> * <b>Yes</b> * <b>No</b>	Yes
<b>Monitoring and Review Strategy 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. 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> </ol>

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.

<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4577
<b>Person ID</b>	1145918
<b>Full Name</b>	Mr Richard Tregoning
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4631
<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>Monitoring and Review Strategy comment</b>	Rubbish, we all know that if these plans for the next 18 years are agreed, then any amendments will be worse for local people and the surrounding countryside.

Developers will see it as 'deal done' and use their considerable resources and money to push ahead with whatever will increase their profits then move on.

**Included files**

**Title** Monitoring and Review

**ID** EGS4798

**Person ID** 1264475

**Full Name** Simon Davies

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Monitoring and Review Strategy comment**

**Included files**

**Title** Monitoring and Review

**ID** EGS4862

**Person ID** 1264521

**Full Name** Max Hidalgo

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4964
<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>Monitoring and Review Strategy comment</b>	Please ensure that commitments to affordable housing and support infrastructure in particular are kept on track by developers rather than just the profitable new housing.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS4988
<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	Yes

<b>* No</b>	
<b>Monitoring and Review Strategy comment</b>	<p>Past experience does not give great confidence that this monitoring will be delivered or be effective. Berkhamsted has delivered new dwellings at a rate 31.2% above the target set in the Core Strategy, while development in Hemel is 9.3% below its target.</p> <p>SP9.2 gives carte blanche to over-ride the agreed plan, increase numbers, change sites and amend/remove policies without explanation of how these will be consulted upon and justified to the electorate.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5051
<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> <b>* Yes</b> <b>* No</b>	Yes
<b>Monitoring and Review Strategy comment</b>	<p>Dacorum does not have the ability to cater even for the 'needs' it has declared in this plan, and under no circumstances should we be expected to cater for the unmet needs of other authorities. This effectively happened in Tring 50 years ago, when the GLC gave itself consent for Silk Mill Farm, overriding the needs of the local authority, and changed the nature of the town without popular consent.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5071
<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>	
<b>Yes / No</b> * Yes * No	Yes
<b>Monitoring and Review Strategy comment</b>	<p><b>Monitoring and Review</b></p> <p>Dacorum is already overwhelmed with housing numbers and should reject any pressure to meet other authorities' unmet need. Especially when the housing need is not evidence based.</p> <p>Hopefully the Government will be forced to use the ONS housing need numbers and scrap the plans for building on Green Belt.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5101
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5158

<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>Monitoring and Review Strategy comment</b>	Please ensure that commitments to affordable housing and support infrastructure in particular are kept on track by developers rather than just the profitable new housing.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5190
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5216
<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>Monitoring and Review Strategy comment</b>	Please ensure that commitments to affordable housing and support infrastructure in particular are kept on track by developers rather than just the profitable new housing.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5222
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5283
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5329
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5360
<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 * No	Yes
<b>Monitoring and Review Strategy comment</b>	I fully agree that an adequate monitoring and review process should be in place. Is it right therefore that the public consultation should happen during a national lockdown and pandemic? surely not! There are many people who have not had their voices heard as have had no opportunity to meet and discuss. I believe there is a very strong local feeling that the council are trying to "sneak" this in without the majority of people even noticing.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5405
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5415
<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 * No	Yes
<b>Monitoring and Review Strategy comment</b>	'evidence established through another local planning authority's Local Plan process shows that its unmet need can only be accommodated in Dacorum;' This should work both ways, so that people live near where employment is as far as is practical. We are in effect already accommodating the housing needs for St Albans. Housing need may go down and is why brown field sites should be built on first.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5424
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5468
<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	
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5605
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5627
<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>Monitoring and Review Strategy comment</b>	<p>In 2 c) the plan will be subject to a review when there are significant changes in national planning policy. As I outlined in my earlier comment the government has announced changes to planning policy to focus on brownfield development in the West Midlands and Greater Manchester and away from rural and semi rural settlements in the South East in December 2020. I do not believe this has been taken into account by the plan and I think the plan should be reviewed as soon as possible.</p> <p>Interestingly if we take the example of two recent developments along Shooters Way the developers have managed to remove several Oak trees and other hedgerow which provide habitat to local wildlife. These trees and hedgerow were to be retained on the approved plans from Dacorum but because there were no TPO on the sites the developers managed to remove these during development. This does not bode well for future development when we would have little confidence that Dacorum was able to monitor or enforce planning policy once development rights have been granted.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5637
<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	Yes
<b>Monitoring and Review Strategy comment</b>	The Policy implies monitoring and review will only take place annually. The reviewing of the Plan should be continuous and publicly reported regularly - at least every three months. Given the significant impact the Plan will have upon the

borough and its communities, those responsible for fulfilling the Plans objectives - Dacorum personnel, builders and developers - should be publicly accountable on a regular basis.

**Included files**

**Title** Monitoring and Review

**ID** EGS5746

**Person ID** 1263016

**Full Name** Joanna Brown

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

**Monitoring and Review Strategy comment**

**Included files**

**Title** Monitoring and Review

**ID** EGS5811

**Person ID** 1264697

**Full Name** Nicholas Wood

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

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

<b>Monitoring and Review Strategy comment</b>	<p>So you begin well stating ' effective monitoring is essential to ensuring that the policies in the Plan remain relevant, up to date and are achieving their aims'. Then you ignore all that.</p> <p>In January the government funded ESCoE was reporting that 1.3m, EU residents have left the UK post Covid and Bank of America is forecasting no net employment growth from 2019 levels for the foreseeable future in London. They will not be returning in anything like the numbers of the last decade as the Government revamps its immigration strategy. Home working is decimating office rents. Homeshopping is decimating the high street. Old style commuter towns like Tring and Berkhamsted are not going to see anything like the need for expensive houses designed to commute into London that they have for the past decade yet you continue to plan like it 2014! Your studies on which you base your assumptions are up to 7 years old. The seismic societal changes of Brexit and Covid are all but ignored in your plan. That is not relevant monitoring and review.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5837
<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	Yes
<b>Monitoring and Review Strategy comment</b>	It is stated that the policies should be reviewed annually; the pandemic has made this need even more vital as our lives are seeing, and will continue to see, a massive shift to home working, staying local, and spending leisure time in the local countryside.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5853
<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>Monitoring and Review Strategy comment</b>	<p>There needs to be a seismic shift in attitude at DBC to how monitoring and review takes place with residents and local Councillors.</p> <p>Voting by party block doesn't help ensure a connection between residents and their local authorities.</p> <p>Whilst it is true 'what gets measured gets done' it is meaningless when the Vision and Strategy are so removed from the lives of residents and businesses.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS5881
<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>Monitoring and Review Strategy comment</b>	Please ensure that commitments to affordable housing and support infrastructure in particular are kept on track by developers rather than just the profitable new housing.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6072

<b>Person ID</b>	1145998
<b>Full Name</b>	Mrs Pauline Hughes
<b>Organisation Details</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6091
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6187
<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> * Yes * No	Yes
<b>Monitoring and Review Strategy comment</b>	Please ensure that commitments to affordable housing and support infrastructure in particular are kept on track by developers rather than just the profitable new housing.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6214
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6243
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6329
<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>Monitoring and Review Strategy comment</b>	Monitoring is going to take up more time than granting permission unless another section is set up to do it. Revising the plan every year because a developer has not built the houses he thought he would is asking for public disaffection unless it means that their dissent is actioned eg they claimed a breach of policy and it turns out to be frustrating delivery.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6371
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6458
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6567
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6574
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6680
<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 * No	Yes
<b>Monitoring and Review Strategy comment</b>	Monitoring can only hold developers to those infrastructure commitments which they have already been made to commit to. The Council is unlikely to have sufficient funding to fix the problems in air quality, traffic jams, health provision, school facilities, sports facilities etc which are gaps in this plan.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6691
<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>Monitoring and Review Strategy comment</b>	I endorse the response of the chiltern countryside group
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6697
<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>Monitoring and Review Strategy comment</b>	I have EXTREMELY low confidence in the monitoring and review provisions proposed. This consultation has wide reaching implications for the residents of Dacorum yet the councle have failed to a) promote the plan b) deliver copies of the plan to homes. Given that a significant proportion (>50%) of the consultation period has been during "stay at home" lockdown conditions, the public are largely unaware of these proposals, and the ability of any action growups to co-rdinate responses is limited.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6770
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6771
<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 * No	Yes
<b>Monitoring and Review Strategy 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.  I endorse the CCG response to this document
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6888
<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	Yes
<b>Monitoring and Review Strategy comment</b>	The Dacorum plan was introduced in response to government policy which has already changed and the consultation has little opportunity to consider the long term impact of COVID-19 and the way in which we will live our lives moving forward. The consultation itself has occurred at a time when inadequate public awareness can be achieved within relying solely to online responses and communication. There has been no written communication from Dacorum on the matter, and as such how has the public been consulted?
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6893

<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS6956
<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>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS7006
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS7010
<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	
<b>Monitoring and Review Strategy comment</b>	Monitoring and review is only for checking to see if aims are being achieved, what about monitoring to see if plans are having a negative impact on the environment or the wellbeing of the inhabitants. Local circumstances seems very vague.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS7045
<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> * Yes * No	Yes
<b>Monitoring and Review Strategy comment</b>	Too late to elaborate.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS7115
<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>Monitoring and Review Strategy comment</b>	This entire strategy needs an urgent review as its proposals are unjustifiable and disproportionate.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS7193
<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>Monitoring and Review Strategy comment</b>	I believe they're already outdated due to COVID19 and it's societal impacts!
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS7234
<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	No
<b>Monitoring and Review Strategy comment</b>	
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS8793
<b>Person ID</b>	1261814
<b>Full Name</b>	Liz Uttley
<b>Organisation Details</b>	
<b>Agent ID</b>	

<b>Agent Name</b>	
<b>Agent Organisation</b>	
<b>Yes / No</b> * Yes * No	Yes
<b>Monitoring and Review Strategy comment</b>	<p>SP9 2a) I am concerned that this policy does not include a requirement that the Local Plan be at fault for the failure of housing being delivered, particularly given the changing economic and social environment we shall be facing over the Plan period.</p> <p>SP9 2b) I am concerned that this puts DBC in the hands of neighbouring authorities, I hope that the reality is more collaborative than this policy suggests.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS9153
<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>Monitoring and Review Strategy comment</b>	Policy SP9 is focused on monitoring and reviewing the rates of delivery. There are no policies that help ensure that developers deliver in accordance with the master plans that gained them permissions. DBC have a derisive record of holding developers to master plans agreed by them and local communities.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS10675
<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>Monitoring and Review Strategy comment</b>	Section (12) Monitoring and Review Do you have any comments on Policy SP9 (Monitoring and Review)? YES Policy SP9 is focused on monitoring and reviewing the rates of delivery. The are no policies that help ensure that developers deliver in accordance with the masterplans that gained them permissions. DBC have a derisible record of holding developers to masterplans agreed by them and local communities.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS11422
<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>Monitoring and Review Strategy comment</b>	1 <b>Monitoring and Review</b> Not sure how Dacorum will act on what it reviews?
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS11427

<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>Monitoring and Review Strategy comment</b>	<p>1 <b>Monitoring and review</b></p> <p>The purpose must be to control, to be able to move towards the vision. At the moment, the developers have the whip hand. To go back to LA3, the target is to produce a certain % of affordable homes. Yet the first phase is revealing a lower %, both failing to meet local needs and will ultimately result in a higher % in the later phases. So much for mixed housing and inclusivity.</p>
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS12123
<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>Monitoring and Review Strategy comment</b>	<p>1 <b>Monitoring and Review</b></p> <p>We are concerned that KKP's reports have not been updated annually, as recommended by them. They also state that after 3 years of non-update, their reports have to be re-drafted. The information contained in the Playing Fields report is</p>

getting somewhat out-of-date already in certain cases, will this situation be reviewed soon? Since TSF's inception some 16 years ago, we have made reps. on and helped structure at least four KKP reports now – all of which were prepared at great public expense but were not updated annually, so became of little or no value very quickly. We have noticed that some of the data and information` in the 2019 reports is already dated and needs updating as a matter of urgency.

**Policy SP9 Monitoring and Review**

No objections

**Included files**

**Title** Monitoring and Review

**ID** EGS14363

**Person ID** 1270640

**Full Name** Geoffrey Llewellyn

**Organisation Details**

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

**Monitoring and Review Strategy comment**

Policy SP9 is focused on monitoring and reviewing the rates of delivery. There are no policies that help ensure that developers deliver in accordance with the masterplans that granted them permissions. DBC have a derisive record of holding developers to masterplans agreed by them and local communities.

**Included files**

**Title** Monitoring and Review

**ID** EGS14490

**Person ID** 1270679

**Full Name** GLENEDEN PLANT SALES LTD

**Organisation Details**

**Agent ID** 1270678

<b>Agent Name</b>	MR WILLIAM LLOYD
<b>Agent Organisation</b>	DLP PLANNING LTD
<b>Yes / No</b> * Yes * No	Yes
<b>Monitoring and Review Strategy comment</b>	We commend Dacorum for including how and when they intend to review the Local Plan upon its Adoption. Setting out the circumstances in which intervention would be required is transparent and makes the policy enforceable and realistic. In relation to any review, we would at this juncture wish to highlight our client's site at Caddington Hall. This site could come forward as an alternative sustainable site, that consists of previously developed land and which is available immediately.
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS14747
<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>Monitoring and Review Strategy comment</b>	4.8 The draft policy sets out that the policies in the Plan will be monitored at least annually to assess if they are fulfilling their aims, this is generally supported and can be fulfilling through an Annual Monitoring Report (AMR) or similar document. This policy also includes various triggers for a partial or complete review of the Plan. These triggers are generally supported, in particular trigger (d) is a sensible inclusion if any policies frustrate delivery of the Plan.

<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS14889
<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>Monitoring and Review Strategy comment</b>	Policy SP9 is supported in principle, although given that inclusion of sites within a local plan is understood to be strongly indicative that planning permission (in some form) will be forthcoming, it is not understood how the monitoring and review will operate in practice if the currently inflated housing need figure is later
<b>Included files</b>	
<b>Title</b>	Monitoring and Review
<b>ID</b>	EGS15321
<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>Monitoring and Review Strategy comment</b>	Our clients support the inclusion of Policy SP9 - Monitoring and Review. It is considered that annual monitoring with automatic review is essential to ensure the housing delivery requirement is being met in full. However, having regard to

the extensive Green Belt, it is considered that an immediate complete review will be the only option to allow further Green Belt release to occur in the event supply is not being maintained.

**Included files**

**Title** Monitoring and Review

**ID** EGS15476

**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

**Monitoring and Review Strategy comment** SEE ATTACHED RESP

**Included files**

**Title** Monitoring and Review

**ID** EGS15640

**Person ID** 1271974

**Full Name** EMILY FORD

**Organisation Details** SENIOR PLANNER

**Agent ID**

**Agent Name**

**Agent Organisation**

**Yes / No** Yes

\* Yes

\* No

<p><b>Monitoring and Review Strategy comment</b></p>	<ul style="list-style-type: none"> <li>• Further to our comments above in respect of the need for flexibility to be built into the housing supply, we acknowledge that Policy SP9 sets out that there will be an early review of the Local Plan if sites are not delivering new homes at the rate anticipated in the housing This could enable additional sites to be identified if necessary to ensure housing need is met in full. As such, Policy SP9 is supported in principle. However, we recommend that any review of sites does not seek to deallocate sites unless there is thorough consideration of the reasons why delays have been incurred and whether development remains deliverable. To this end, we recommend that the triggers for a review set out within Policy SP9 are refined and more detail provided to specify what will trigger a review, for example what degree of delay to delivery will be considered unacceptable and what will be considered a 'significant' change in national planning policy.</li> <li>• Positively, any unmet need to be accommodated in the Borough, derived as a result of ongoing work on the Joint Strategic Plan or through discussion with neighbouring authorities in accordance with the Duty to Cooperate, could be addressed through the approach proposed in Policy SP9. This is also supported as it should enable housing needs to be fully addressed within a timely</li> </ul>
<p><b>Included files</b></p>	