

Appendix 2c

Responses by Consultation point

14-Housing Delivery - Pages 2 to 455

15-Employment Development

Pages 456 to 576

16-Retailing and other Town Centre uses

Pages 577 to 668

17-Climate Change and Sustainability

Pages 669 to 993

18-Environment and Biodiversity

Pages 994 to 1330

19-Managing Development in the Countryside

Pages 1331 to 1473

20-Delivering Great Places

Pages 1474 to 1586

21-Sustainable Transport

Pages 1587 to 1836

22-Healthy Communities – Pages 1837 to 2007

14 Housing Delivery responses

Title	Housing Delivery
ID	EGS12
Person ID	1253652
Full Name	erica vilkauls
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ COU COVID LAND GRBT
Housing Delivery comment	<p>We do not need more housing in the villages and small market towns. To start your plan from that premise is incorrect. The world has moved on since you put together these plans (well, I hope that's your excuse).</p> <p>We need to preserve Gren Belt and AONB and NEVER allow buiding of any sort. You risk stirring up a huge amount of bad feeling (at best)</p>
Included files	
Title	Housing Delivery
ID	EGS48
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	OBSV NOC
Housing Delivery comment	<p> The indication in 14.1 stating <u>“delivering a minimum of 35% affordable housing”</u> covers the existing active housing list of 5,500. Does this mean that some people on the housing list may well have an 18 year wait and that by 2038 the list will be down to the hundreds? Is the 35% inclusive of housing plans for the aging populous of Dacorum? How many of the 35% (5,500 properties) will be owned by the councils ARCH. In section 14.3 In respect of affordable housing it states that: <u>“other opportunities exist for affordable housing in the countryside”</u> mean the loss of green belt land. In sections 14.6 & 14.15, with reference to accommodation for the future need for the travelling community. Why, when there is a land shortage for local housing, is there plans for more Travellers and Gypsy pitches. Surly more the land would be lore useful for building permanent residency accommodation for the local populous. Travellers and Gypsies by nature just move on from one location to another and do not tend for inter act with the local permanent residents. This just contradicts your Neighbour Hood planning strategy ref statement in11.1/2/3&5 about local having a say in the development. Like in section 14.8 states the government wants more home ownership, but housing property prices in the Dacorum area are well out of the local first time buyers range so the only purchases on most properties will be people from outside Dacorum buying to commute into London. But saying that the proposal for First homes to <u>be sold with a discount of at least 30% and will be prioritised for first-time buyers, serving members and veterans of the Armed Forces, and key workers</u> and that <u>the discount will be passed on to future buyers so that these homes will always be sold below market price.</u> is an encouraging idea. But could this be extended to local people who may live in rented or shared accommodation that have are employed locally on a low wage be granted the same opportunity?? This still only equates to 4,125 out of the 16,500. With ref to policy DN1, table 5 why there are no 3 bedroom houses to be built for the affordable housing mix. 14.22 states that affordable housing must comply with affordable housing for rent, including social rent and affordable rent; what is the difference between social rent and affordable rent. Once again HOW MANY OF THE OF THE AFFORDABLE RENT PROERTIES WITH BE ARCH OWNED AND CONTROLLED. At the moment local housing associations are charging up to £1,200 a month for some accommodation. This is more than some local private rents. How many of the of the 363 properties shown in Table 6 Affordable Housing Need across South West Hertfordshire (per annum) will be ARCH owned. </p> <p> This topic has been padded out by continuous repetition of statements and figures . So I would say I would support the affordable housing plans for the rentable and keyworkers and armed forced personnel to buy properties at a reduced market price. I still feel the ongoing drive to use potential building land for increased pitches for travellers and Gypsies is one of misguided ideology. Permanent local communities require more homes, more homes require land to build on not concrete hard standings. </p>
Included files	
Title	Housing Delivery

ID	EGS132
Person ID	1248941
Full Name	Mr Stuart Findlow
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ TR01 GRBT LAND HECH BAGI EMPL ENV INFR ENVH RETL FRAD COVID OSSL GRO
Housing Delivery comment	<p>I am vehemently opposed to the development of the site reference/growth area Tr-01- Land at Dunsley Farm Tring, which incidentally has been turned down in the past because of its lack of suitability.</p> <p>This land is designated Green Belt and it is bordered by the Chilterns Area of Outstanding Beauty. It is essential that the setting of AONB should be preserved and not damaged. It is also a green corridor into the town and it is part of the established character of Tring. If this land is developed it will destroy the largest and main green gateway to Tring. People entering Tring via this route are greeted with wonderful views displaying lush green undulating open fields, beautiful trees, plants, orchard land and farms. It is these sights that give Tring its sense of identity, namely that of a small unspoilt rural farming town. Supporting evidence of what will be lost can be seen in the attached photograph.</p> <p>Developing this land will result in the loss of two farms which have been worked for many generations by the same families. The dairy herds are very productive and serve an extremely useful purpose, especially now that we have left the EU and at a time when government directives encourage the country to be more self-sufficient with the production of food. It would be a crime to displace farmers and their workers who labour hard and take such pride in their essential occupations.</p> <p>Site Tr01 contains valuable wildlife and wild plants that will be destroyed and not replaced, thus eradicating more of our countryside heritage. Recently, Matt Baker, on the television programme 'Countryfile', pointed out the significance of maintaining biodiversity in Hertfordshire. Once hedges are cut down important biodiversity is lost forever. If site Tr01 is developed then local people will lose the benefit of a healthy and biologically diverse environment.</p> <p>Placing houses on the Tr01 site would place too high a demand on the services that Tring has on offer, or would be able to provide. Doctors' surgeries are unable to cope with the current demand with waiting times of two weeks. Even if the range and depth of services were increased it would be at further cost and it would change the charm of Tring. Lost forever would be Tring's quaintness and the impact of its historical buildings and shops in a confined area. Furthermore, there would be increased traffic pollution and congestion.</p>

Tring has a petrol station, a Tesco and a Marks and Spencer supermarket. It certainly does not need any more of these types of buildings. However, this would have to happen if adequate support is to be given to new housing.

Recent police force cuts have meant slower response times to local crime and this will put more pressure on this over-stretched service. There would probably be an escalation in trouble with bored children and young adults roaming the streets.

It does not make sense to put industrial units and warehouses on this site when there are more suitable areas already containing warehouses at the other end of town with easier access to the bypass.

This site is not wise for a number of reasons. Firstly, the water rolls down the Chiltern Hills and creates flood plains at certain times of the year. This problem is compounded by the fact that the proposed building land is not flat. In fact, special drainage is placed on property in Dorian Close in order to prevent flood damage from occurring to buildings there. Also, Damask Close and Station Road have had problems with flooding in recent years, despite the provision of storm drains being built there. Secondly, the noise from traffic on the London Road and the bypass is extremely loud. Furthermore, there is also additional noise from the aircraft travelling overhead on their flight paths to and from Heathrow and possibly Luton. Special provision for more housing would increase noise levels tremendously.

Covid 19 has resulted in many local businesses being forced to close. Tring High Street has several empty shops. It will be many years before local businesses recover, and therefore if a large number of houses are built, people will be forced to find jobs in larger towns. This will increase pollution caused by car fumes and put extra strain on an already inefficient rail service into London.

Many people have worked hard all their lives in order to obtain substantial property that backs onto site Tr01. Building on the fields will ruin residents' views of a picturesque landscape and diminish their sighting of wildlife. Valuable footpaths will be lost for walkers. It will also mean that residents will suffer from extra light pollution and noise pollution and possibly increased crime. Furthermore, it will devalue their property substantially. Current nearby residents would be unable to move even if they wanted to.

If site reference Tr 01 land at Dunsley Farm Tring is chosen, more drivers will choose to bypass the area near Tesco and instead use Cow Lane as a short cut to avoid congestion. Cow Lane is a dangerous, narrow lane with an uneven camber and an unrestricted speed limit in places. At weekends this road is still busy and hazardous. This is because adults and children attend rugby, football, squash or bowls at the clubs along this road. There is inadequate parking and this results in cars parking on the bend of the road and on grass verges. Cow Lane will not be able to safely cope with an increase in traffic. A proposed new major road junction on Cow Lane will only increase congestion and make the road more hazardous.

Building on such a large scale at Dunsley Farm will mean that Tring will sadly eventually become a sprawling, large town devoid of individual character and merged with Aylesbury and Berkhamsted. This can be seen in the way that Potten End has lost its rural charm because it has been swallowed up into Hemel Hempstead because of over-zealous building.

Included files

[0R1A9257.JPG \(1\)](#)

Title

Housing Delivery

ID	EGS147
Person ID	1256692
Full Name	Cliff Slynn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS165
Person ID	1257378
Full Name	Jackie Jones
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS
Housing Delivery comment	* I would like to see attention focussed on providing social housing. This is something which the borough does not have enough of.

* Also I would like to see accommodation aimed at people wanting to downsize, so as to encourage the housing market to flow. Such accommodation should cover all budgets, including high quality property.

Included files

Title Housing Delivery

ID EGS209

Person ID 1257490

Full Name Lucy Muzio

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBJ HOUS GRBT INFR

Housing Delivery comment

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

Included files

Title Housing Delivery

ID EGS213

Person ID 1258030

Full Name Amy Harman

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS256
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	NOC HOUS
Housing Delivery comment	Provision for nomadic people should be restricted to the genuinely nomadic. The Canal and River Trust need to be supported in controlling online residential moorings.
Included files	
Title	Housing Delivery
ID	EGS290
Person ID	1258731
Full Name	Tony Broadbent
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	HOUS PWCG
Housing Delivery comment	<p>I suspect it is a standard practice, but the facility to accept a financial contribution where it is impractical to build affordable housing feels a very poor arrangement. I would much prefer to see the developer committed to actually build the affordable housing first, perhaps at a different location, then be permitted to build the proposed “luxury” development.</p> <p>It would be good if a cap could be included on such financial arrangements, to avoid the situation where zero affordable houses are actually built, but the council has a new revenue stream to offset B&B provision!</p> <p>Looking at Table 6, this shows a demand of 611 affordable houses per annum in Decorum. If only 35-40% of the 922 dwellings built per annum are affordable, this demand is not being met. Perhaps I have wildly misunderstood... is the 611 per annum a total demand (ie. Includes those already in affordable housing), or ‘New’ demand? Is there a backlog /waiting list which should also be taking into account? Perhaps some clarification of how these different pieces fit together... or are they simply unrelatable?</p> <p>Is the plan more designed to hit the overall build figure than to actually address the stated need for affordable housing? If your 18 year plan doesn’t attempt to meet local needs, are we accepting defeat before the battle even starts. Again, apologies if I misunderstood.</p>
Included files	
Title	Housing Delivery
ID	EGS310
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS322
Person ID	1259852
Full Name	Imogen Wagstaff
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	HOUS GRO FRAD CLI
Housing Delivery comment	I understand that dacorum needs additional housing and I fully support the development of affordable housing. I am concerned that this housing development is on such a large scale and involves building on green belt sites. New developments should be located on brownfield sites, include a significant proportion of affordable homes and these should be located where shops and amenities are easily accessed without the need for a car. This is not true for many of the proposed sites, particularly those on green belt areas. Consideration should also be given to the effects of flooding and other consequences of climate change, the risk for which will be increased by felling woodland and building on natural areas which would otherwise have soaked in water and acted as a natural defence against flooding.
Included files	
Title	Housing Delivery
ID	EGS355
Person ID	1259924
Full Name	Bassil Aslam

Organisation Details	
Agent ID	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP DM1, DM2, DM3, DM8, DM10, DM11, and DM12 CYALT
Housing Delivery comment	Support is given to Policies DM1, DM2, DM3, DM8, DM10, DM11, and DM12, with reference to the proposed new Housing development site being put forward for consideration by the Council in Flamstead ie. Land lying to the West of Chequers Hill.
Included files	
Title	Housing Delivery
ID	EGS371
Person ID	1260058
Full Name	Redbourn Parish Council
Organisation Details	
Agent ID	1260042
Agent Name	David Mitchell
Agent Organisation	Redbourn Parish Council
Yes / No * Yes * No	No
Officer Comment	NOC
Housing Delivery comment	
Included files	

Title	Housing Delivery
ID	EGS408
Person ID	1260241
Full Name	BASSIL ASLAM
Organisation Details	
Agent ID	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP DM1, DM2, DM3, DM8, DM10, DM11, and DM12 CYALT
Housing Delivery comment	Support is given to Policies DM1, DM2, DM3, DM8, DM10, DM11, and DM12, with reference to the proposed new Housing development site being put forward for consideration by the Council in Flamstead ie. Land to the East of Chequers Hill.
Included files	
Title	Housing Delivery
ID	EGS508
Person ID	1260803
Full Name	Rollo Prendergast
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ NOC

Housing Delivery comment	The NPPF requirements will not be met by this Growth Plan. Again, the reason is the piecemeal development. The lack of scale, USPs of favoured developers, market price of land in the locations favoured, do not add up. Please see 6. Affordable Housing attached.
Included files	6. Affordable housing.docx
Title	Housing Delivery
ID	EGS539
Person ID	1260255
Full Name	KTB Commercial
Organisation Details	
Agent ID	1260252
Agent Name	Peter Biggs
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ COU HOUS PWCG
Housing Delivery comment	<p>Policy DM3 refers to Rural Exception sites. Part 1 of this policy promotes schemes of up to 10 dwellings for local affordable homes will be promoted in and adjoining selected small villages in the countryside as established in Policy SP3.</p> <p>Whilst it is acknowledged that Rural Exception sites should be located in sustainable locations, Policy DM3 only directs this form of development to “selected” smaller villages. It does not refer to the larger villages and it does not refer to other smaller unnamed villages.</p> <p>This approach is contrary to guidance contained within NPPF paragraphs 77 to 78. Paragraph 78 states that “Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”</p> <p>Policy DM3 does not promote this approach set out by the NPPF and seeks to only allow Rural Exception sites to selected smaller villages.</p> <p>On this basis, the Policy is in conflict with national planning guidance and is unsound.</p>
Included files	

Title	Housing Delivery
ID	EGS586
Person ID	1261094
Full Name	Joanna Crawford
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I strongly reject the proposals for additional housing on green belt approaching the boundary of Great Gaddesden Parish. The size of the development is excessive to government requirements and will create a link road bringing additional traffic to a pinch point at Water End Bridge. We need to preserve our Green Belt and an alternative site/sites should be found on brownfield site or existing old buildings. Great Gaddesden is an AONB and this massive development threatens to ruin this tranquil space.
Included files	
Title	Housing Delivery
ID	EGS601
Person ID	1261122
Full Name	Mark Slade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Officer Comment	OBJ HOUS URBD
Housing Delivery comment	Where does the idea that 'all sections of the community' want to live together come from - nonsense? This gives no thought to the fact that all planning is a compromise - be honest and say that the low cost, high volume housing will be low quality and attract people who can't afford something better?
Included files	
Title	Housing Delivery
ID	EGS617
Person ID	1059789
Full Name	Mrs Alison Somek
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV OSSL
Housing Delivery comment	I support the sections on housing for older people and adapted housing, especially the recognition of changing needs. Older people may not require "adapted" housing per se but do need accessible homes, that have space to allow the use of mobility equipment and that are accessible to outdoor space. Mental well-being is as important and physical and green space is crucial to this. This must be considered when looking at density.
Included files	
Title	Housing Delivery
ID	EGS629
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	

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

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	Housing Delivery
ID	EGS696
Person ID	1256588
Full Name	Wendy Silcock
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ NOC
Housing Delivery comment	Greater consideration needs to be given to the provision of genuinely affordable homes for key workers such as NHS staff, teachers, emergency services staff etc as in most areas of Dacorum, and particularly Berkhamsted, all of the so called 'affordable properties' built recently were well out of reach of most of these people. There are few housing trusts in the area offering shared ownership schemes. Increasing the number of these would make a significant difference.

Included files	
Title	Housing Delivery
ID	EGS713
Person ID	1261251
Full Name	Lesley Ashden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS733
Person ID	1261250
Full Name	Christina Thompson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	NOC

Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS767
Person ID	1260463
Full Name	Jenny Dickerson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS771
Person ID	1261262
Full Name	Paul Bayley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS886
Person ID	1261480
Full Name	Ms Kelly Catchpole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ
Housing Delivery comment	<p>Whilst I understand the need for more housing in the borough I think building flats and apartments is not going to help with the housing situation, most of these people that are in flats and apartments are now looking for maybe 2-3 bed houses, two and three bedroom houses are not always being built. We also have a lot of elderly residents that live in these three or four bedroom houses they do not want to give up their three or four bedroom houses because they do not have a garden or feel safe living within social housing areas , therefore I think it would be a good idea to maybe build some retirement properties within a retirement village , ir just more bungalows - likewise people living together feeling safe, this freeing up the larger properties we need for this circle of housing.</p> <p>Offer them nice bungalows with small gardens for them to relax.</p> <p>Put them in nice areas close to amenities & on bus routes so they can maintain their independence.</p> <p>Stop selling the larger properties on right to buy, we need 4 bed houses, we don't need apartments for growing families.</p> <p>High rise properties don't always look nice either, we have beautiful open spaces let's try to main rain these areas or beauty.</p>
Included files	

Title	Housing Delivery
ID	EGS943
Person ID	1205804
Full Name	Mrs B. Watson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP HOUS
Housing Delivery comment	Good plan for disabled access
Included files	

Title	Housing Delivery
ID	EGS944
Person ID	1205804
Full Name	Mrs B. Watson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS

Housing Delivery comment	but I am not convinced there is a big demand for leasehold retirement housing
Included files	
Title	Housing Delivery
ID	EGS967
Person ID	1261569
Full Name	Karen Mellor
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>I view the current developers as not fit for purpose in order to ensure that all future development is climate proofed. I have seen no mention of building standards (such as Passivhaus) or proposed designs that would prove that this council is committed to Adaptation. ie. recent buildings programme in Norwich that one the Riba Sterling Prize in 2019. Or proposals to ensure that all future development starts as it means to go on by implementing technologies that are going to be statutory come 2030 ie. Not gas.</p> <p>On the proposed self build/custom build. How do you intend to promote these or ensure that developers give up parcels of the land to accommodate these.</p> <p>Regarding Car Parking provision; 2 bed and larger houses should have provision for adequate parking ie. at least the same amount of parking to number of bedrooms. 1.5 parking spaces is a total joke and causes serious parking issues as can be evidenced from the fiasco down Red Lion Lane in Apsley Mills due to parking issues from the new flats.</p>
Included files	
Title	Housing Delivery
ID	EGS1102
Person ID	1261701
Full Name	Raeeka Yassaie

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO GRBT SUP PDL
Housing Delivery comment	<p>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.</p> <p>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.</p>
Included files	
Title	Housing Delivery
ID	EGS1124
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP HOUS

Housing Delivery comment	<p>In general I think that the housing policies are good and well thought through.</p> <p>The mix of housing types, tenures and provision of affordable homes within large developments and a commitment to well planned developments, should lead to attractive and sustainable housing for the district.</p> <p>I am concerned that the large concentration of housing in the south east will have a negative impact on the transport network, environment, water and drainage. However I do understand that it is a result of the government's housing policies and numbers.</p>
Included files	
Title	Housing Delivery
ID	EGS1185
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP NOC
Housing Delivery comment	<p>DM1 I support a variety of housing stock and mix in developments. Custom and self build should be supported and not necessarily on larger sites. Flexibly planned and adaptable homes that can adapt to future needs should be encouraged. Developments should not be too big and include infrastructure, support facilities determined by local neighbourhood master plans.</p> <p>I support DM5, DM8 in particular.</p>
Included files	
Title	Housing Delivery
ID	EGS1216
Person ID	1142889
Full Name	Dr Peter Chapman

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV NOC
Housing Delivery comment	Re Para 14.6. Whilst recognising the ethnic minority status of Romany Gypsies and Irish travellers, any land set out for their use should be severely restricted. Otherwise others may be inclined to join their lifestyle
Included files	
Title	Housing Delivery
ID	EGS1238
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ PWCG
Housing Delivery comment	<p>Policy DM2 ‘Affordable Housing’, section 14.24 (Page 61)</p> <ul style="list-style-type: none"> The last bullet point states ‘<i>resisting the subdivision of sites to avoid on-site contributions</i>’. We strongly recommend that this very weak, albeit well-intentioned, statement be re-worded to ‘<i>the subdivision of sites to avoid on-site contributions is prohibited</i>’ Without being far stronger on this issue, there is serious risk of a massive hole being blown in aspirations regarding provision of affordable homes. This point needs to be incorporated into policy DM2.

Policy DM8 'Custom and Self Build Housing', (Page 70)

- We strongly encourage self-build, as a catalyst to encourage the delivery of truly affordable homes and/or homes built to high environmental standards. A target of circa 70 homes out of a total of 16,000 is, however, quite inadequate, being less than 0.5%. Demand would increase significantly if this were an easier option. We would like to see the overall proportion of self-build to approach at least 5% in total by the end of the Plan's timeframe.

Included files

Title Housing Delivery

ID EGS1265

Person ID 1261930

Full Name Chris Gee

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ TRI AHST
OBSV TRALT

Housing Delivery comment

It is acknowledged that an evidenced based approach has been taken in the decision making process to allocate new housing and developments. However this approach fails to consider the holistic overall shape and feel of the towns affected. Looking at the example of Tring, much of the development (c2200 homes) are ear-marked for the eastern end of the town. Properties at this end of town in the Grove Road area are already a considerable from the town centre. By allocating another 2200 properties to the east, all the way down to the canal, along Station Road and Icknield Way, will result in a very distended shape of the town. People dwelling in the very far reaches of this community will not walk into the town centre, but will instead choose to drive, increasing the local traffic demands considerably.

In effect Tring will become 2 towns, one the historic town as is, and the other, a "new town" development. Provision of shops, community centres and social hubs in this development area will further lead to a lack of local integration. This evidence based approach on deciding individual development plots does not cater for this rounded view of community being integrated. Better would be to give a greater weight or scoring on retaining the shape of the town, to encourage developments in a better cohesive and structured way. An example would be to consider the citing of houses between

Park Road and the A41, or in the lands around Miswell Farm, both of which could accommodate dwellings, much closer to the town centre.

Included files

Title Housing Delivery

ID EGS1298

Person ID 1261957

Full Name Jeremy Johnson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ PWCG URBD

Housing Delivery comment

These planning documents already refer to the fact that much of Dacorum is heavily developed, there is pressure on land, housing, the environment, biodiversity, services and amenities. There is competition for space.

Your planning document refers to the Gypsy and Traveller Accommodation Assessment Final Report 2019 the summary under page 8 Conclusions refers to a need for "69 additional pitches for Gypsy and Traveller households who did not meet the planning definition".

If you have travellers who have always been based in Dacorum it is reasonable to consider their needs but understand that they have exactly the same rights and responsibilities as any other resident of Dacorum and they should not be given preferential treatment. If they "do not meet the planning definition [of a traveller]" then you should not be planning for them as a separate group. There is also no such thing as a "non-nomadic traveller". You should also not be planning for "unknown" travellers. Discriminating for this group of people on the basis of claimed ethnicity is as offensive as discriminating for somebody on the basis of their skin colour.

If you are planning for people to be allowed to live in static caravans then this opportunity should be as open to people who do not claim to be "gypsies" or "travellers" as those that do.

Also, I can see evidence that you have researched the needs of travellers, but I cannot see anywhere where you have researched the needs of residents living near travellers sites. This part of the plan refers a need to 'avoid' impacts on other residents; the wording needs to be strengthened to 'prevent' rather than avoid. Before finalising your plan please

take a look at the travellers' site in Stoke Mandeville and note that it is an eyesore. Please also take a look at the travellers sites around Little Billington and Slapton and take account of what happens when things go wrong. These sites are right on the edge of Dacorum and your plan fails here you will very easily and quickly suck in problems from elsewhere.

Included files	
Title	Housing Delivery
ID	EGS1307
Person ID	488516
Full Name	mr hugh siegle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV BER
Housing Delivery comment	<p>I support Policies DM1 and DM2. The challenge for the Council will be achieving adherence to these particularly in the more affluent areas of the Borough where developer resistance will be highest. All housing consents should have a condition that affordable housing is provided on site and not "bought out" to become some other organisation's responsibility.</p> <p>Recent house sales campaigns in Berkhamsted have marketed two bed houses to "first time buyers" at circa £450, 000. Current finance offers require a deposit of £80-90,000 and an annual income of £90,000. . "Affordable" homes may be cheaper but still require very high annual earnings, which puts this policy at risk.</p>
Included files	
Title	Housing Delivery
ID	EGS1331
Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS1447
Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV
Housing Delivery comment	<ul style="list-style-type: none"> I call for the 40% minimum affordable homes objective to be enforced across the
Included files	
Title	Housing Delivery
ID	EGS1462
Person ID	1253872

Full Name	Georgia Huelamo
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO COVID RETL BK07 AHST ENVH BAGI BER SUP PDL
Housing Delivery comment	<p>The housing target is wrong. Exceptional circumstances for meeting housing need in full have to be shown, and have not been demonstrated in this consultation.</p> <p>It is not acceptable that other brownfield sites have not been considered and the fact that there is still planning in the pipeline which has not been included in the numbers.</p> <p>There is an underestimate of potential brownfield regeneration opportunities and the plan fails to take into account the impacts of COVID 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 mentioned in the plan. The windfall will result in negate the need for development on Green Belt and greenfield sites outside of existing towns and villages.</p> <p>The council need to 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.</p> <p>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.</p> <p>Additionally, due to recent events (Covid and Brexit) and trends in the retail sector, the government has announced a new approach to 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.</p> <p>Permitted development rights also 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.</p> <p>It looks like Berkhamsted is merging into Northchurch. Northchurch is its own village. We are not West Berkhamsted. Northchurch High Street is going to be incredibly busy with the influx of 200 + cars. New Road Lock field development</p>

is an awful idea. Congestion is a problem on this road is going to exasperate congestions. Another 120 vehicles on the road will be inc and potential for the pollution to rise even further. The chalk stream by the canal is incredibly important. There are some inappropriate suggestions about traffic corridors. Bell Lane and Darrs Lane is a one way ancient and sunken road. It has huge biodiversity significance. How can it be suggested that this be a main thoroughway from shootersway down to the High Street? I don't see any traffic management plans in this consultation. The Tesco area in Northchurch is already congested . Where is all this traffic going to go? Berkhamsted High Street is very busy at times. I don't see these questions being answered anywhere in the local plan.

Included files	
Title	Housing Delivery
ID	EGS1501
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS1560
Person ID	1261809
Full Name	Pam Ferguson
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP NOC
Housing Delivery comment	I support the provision of more affordable homes in the borough.
Included files	
Title	Housing Delivery
ID	EGS1611
Person ID	1262282
Full Name	Lisa Rowe
Organisation Details	
Agent ID	1262276
Agent Name	Giulia Bunting
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV NOC
Housing Delivery comment	<p>Policy DM2 Affordable Housing</p> <p>The requirement to provide the levels of affordable housing within proposals should be subject to viability testing to ensure that the requirements do not undermine the deliverability of the Plan, as required by para. 34 of the NPPF.</p> <p>Policy DM8 Custom and Self Build Housing</p> <p>BFI is concerned about the practicality or indeed demand for requiring 5% self and custom build properties on allocations of 40 or more homes. Whilst the requirement is subject to viability testing this requirement could undermine the deliverability of the Plan (para. 34 of the NPPF).</p>

Included files	
Title	Housing Delivery
ID	EGS1637
Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS1786
Person ID	1154047
Full Name	Brendon Sparks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO BER TRI GRBT

Housing Delivery comment	<ul style="list-style-type: none"> The windfall calculations and projections are flawed and leads to a faulty delivery strategy that prioritises building on Green Belt, especially surrounding Berkhamsted and Tring, over brownfield and urban development (contrary to NPPF as previously stated). Holding back the bulk of the Hemel Garden Communities allocation for after the Plan is illogical. The Berkhamsted Delivery Strategy is clearly developer led and offers no protection to Green Belt or infrastructure improvements for issues that already exist. I previously supported your core plan in 2013. The new proposal turns your/the Council's arguments on its head!
Included files	
Title	Housing Delivery
ID	EGS1811
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS1845
Person ID	1262473
Full Name	Mr William Tannett
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO GRBT SUP PDL
Housing Delivery comment	A large amount of green belt land is proposed to be utilised, surely only brown field sites should be exclusively used - if I agreed with such a huge apparent need. A more sustainable smaller housing requirement could be met purely from brownfield sites.
Included files	
Title	Housing Delivery
ID	EGS1916
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	It is not clear what amount of the new housing will be genuinely affordable - ie by local residents - our children etc - rather than people moving to Dacorum from, eg London. Requirements for affordable housing must be enforced for all new developments; the developers must not be able to "wriggle" out of their obligations.
Included files	
Title	Housing Delivery

ID	EGS1974
Person ID	1262618
Full Name	Jasmine Jenkins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	DM1 Its a good idea to have a hosing mix but will there be specific housing association affordable houses for rent?. It says in relation to what people can afford 87% of renting should be social renting so how can you ensure that there is enough affordavble houses to rent. In relation to hoouse ownership wil there be shared ownership schemes because no houses wil lbe affordable in this area even 1 or 2 bed houses
Included files	
Title	Housing Delivery
ID	EGS2009
Person ID	1262601
Full Name	Anne Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	

Housing Delivery comment	Northchurch's semi rural character and build density does not lend itself to the high density builds proposed at Lock Field and Darrs Lane or to any high builds.
Included files	
Title	Housing Delivery
ID	EGS2043
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS2056
Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS2091
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Housing Delivery. Volume of housing is based on an out of date matrix and is too big. Over the borough there is a lot of affordable/smaller housing. People need to cut their cloth to suit their budget and that has always been the case. I'd like to live in a mansion but I choose to live in an expensive area so have to compromise on my house size. I think the issue is more about paying people fairly so they can afford to live and buy property. If nurses were paid more fairly for their work they would find it easier to buy a home. Most people who live in expensive houses have had to work bloody hard to get them I don't quite see why it is now appropriate to destroy areas with massive development and small houses (which bring high density population and strain on services) to give people cheap houses that everyone else has worked hard to get.
Included files	
Title	Housing Delivery
ID	EGS2111
Person ID	1262797
Full Name	NICK TURNER
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS2131
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>What is the evidence base for the Tring developments? The "plan" for the travelling community needs to be VERY WELL thought through. I know that in areas around ST. Albans they have had a very negative impact on the community and its services. This is especially worrying for a town like Tring that effectively has no police presence at all. While I understand</p>

the requirement for housing across a mix of the population, I would expect there to be plans for compensation to existing residents if your plans bring the local environment down and, thus, house prices. If the existing residence have to pay increased council taxes for the inevitable extra policing and other services required that is not fair in any way and has been very poorly thought through.

Included files	
Title	Housing Delivery
ID	EGS2158
Person ID	1261286
Full Name	John Saner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS GRBT LAND
Housing Delivery comment	Housing delivery The change in employment patterns and reduction in demand for office space caused by the pandemic, will allow use of brownfield sites to be redeveloped and for commercial buildings to be converted to residential use. 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. The projected numbers of new houses is too high for the rural nature of Dacorum and its proximity to the Chilterns AONB.
Included files	
Title	Housing Delivery
ID	EGS2197
Person ID	1262765
Full Name	Paul Rees
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The housing delivery policies are wrong-headed. While it is important that any package of new home delivery should include social housing, the overall number of new homes envisaged under these policies should be halved given the scale of climate and ecological crisis.
Included files	
Title	Housing Delivery
ID	EGS2203
Person ID	1262841
Full Name	Nada Ryan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I certainly support the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable although recent housing developments go to show this target around Berkhamsted is not being achieved which makes the Council's strategy even more untenable.
Included files	
Title	Housing Delivery
ID	EGS2223

Person ID	1262860
Full Name	Susanne Rees
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Given Dacorum's stated desire to promote sustainability and biodiversity, the housing delivery policies are poor - as they will drive up the number of new homes being built and therefore lead to the destruction of biodiversity and add to climate change.
Included files	
Title	Housing Delivery
ID	EGS2241
Person ID	1262866
Full Name	David Demmery
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I cannot find an policy statement on the trend for smaller and village properties to be bought up as second and holiday homes. We have examples in the village where we live of modest cottages being bought up and rented out on short term holiday lets through Airbnb and similar.

There does not appear to be any policy approach to encourage the trend in certain locations only or regulate the short term rental sector to ensure change of use to commercial use as 'whole house holiday accommodation' is in any way restrained.

The negative effect of the trend to second and holiday homes include pricing out local families negating the drive to supply affordable housing, reducing the viability of local schools and other amenities as short term lets are only occupied at weekends and in the better weather months, and the occasional nuisance weekend renter.

I appreciate the Airbnb phenomenon may be an area national policy should lead but I would welcome Dacorum's local plan policy view on the issue.

Included files

Title Housing Delivery

ID EGS2265

Person ID 1262925

Full Name Nandipha Jordan

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment

Housing Delivery comment 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.

Included files

Title Housing Delivery

ID EGS2291

Person ID 610662

Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	BRAG supports the overall direction of policy which identifies that the Borough's greatest need is for affordable homes to rent or buy and setting this at 40% on sites of more than 10 homes and that this should be provided on-site. The challenge will be achieving this in the more affluent parts of the Borough such as Berkhamsted, where developers will seek to conflate demand with need and argue that the Policy makes developments unviable and/or reduces their ability to contribute to infrastructure requirements. The real pressure should come on land values and the central Government need to enact their White Paper proposals on the provision of affordable housing to assist a robust application of the Borough's policy.
Included files	
Title	Housing Delivery
ID	EGS2326
Person ID	1261830
Full Name	alistair budd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	

Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS2338
Person ID	1262984
Full Name	Deborah O'Sullivan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	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.
Included files	
Title	Housing Delivery
ID	EGS2374
Person ID	1254107
Full Name	Polly Eaton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	
Housing Delivery comment	<p>The housing credentials of sustainable materials and attaining net zero by 2030 are noted in item 2.58 of Housing: Policy background and Policy Papers and then without any substance in the proposal.</p> <p>This section goes on to say</p> <p>“That an action plan will be developed as soon as possible. That we ensure all services make the maximum possible impact in challenging the extent and causes of climate change. The developing new Local Plan will incorporate the maximum possible sustainability requirements that the system will allow, and encourage developers to go beyond this in order to future proof homes and buildings.”</p> <p>“encourage developers” is NOT good enough, ALL new houses MUST be fitted with appropriate heating and power systems, and NOT be fitted with reliance on fossil fuels. This technology is available NOW (air source heat pumps), and no house built today should have be reliant on fossil fuels.</p> <p>There is some acknowledgement of accessible housing, and then a get out clause to not provide any ie</p> <p>“...that all dwellings should beM4(2) compliant. However the report recognises that this may not be achievable in all schemes due to a variety of site constraints and noting potential viability issues. Furthermore, it usefully highlights that such homes could be considered as ‘homes for life’ and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.” (15.74 Housing: Policy background and Policy Papers)</p> <p>Nearly all sites are building from scratch and therefore ALL houses can have accessible options.</p>
Included files	
Title	Housing Delivery
ID	EGS2378
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS2414
Person ID	1227518
Full Name	Mr John LOWRIE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery 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	Housing Delivery
ID	EGS2415
Person ID	1262981
Full Name	Chris Mabley
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>The definition of affordable housing is not fit for purpose.</p> <p>Community Infrastructure Levy or s106 payments do not reflect local need or opinion. For example school and health decisions are outside DBC control so housing plans may offer a school and health centre but these are outside the housing development itself.</p> <p>The prediction of housing need is faulty because the evidence collected is out of date in particular for Covid 19 work practices and building regulations for climate change and sequestration of carbon emissions.</p> <p>Minimum density standards for all locations must factor in safe space access, as well as transport other than by car. Pedestrianising areas seems to generate more need for parking, as does providing footpaths in the countryside, eg Boxmoor Trust car park by the Old Barn gets full of cars.</p>
Included files	
Title	Housing Delivery
ID	EGS2576
Person ID	1262037
Full Name	Jason Silver
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The plan needs to take into account affordable housing and this is tough challenge within the confines of Berkhamsted (socio economic circumstances) and needs to be adequately thought through - currently lacking detail and substantiation
Included files	

Title	Housing Delivery
ID	EGS2580
Person ID	1263199
Full Name	Richard Hardy
Organisation Details	Walbrook Planning Consultants
Agent ID	1263197
Agent Name	Richard Hardy
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Dacorum's Urban Capacity Study (November 2020) confirmed that there is a lack of available brownfield land and urban sites to meet the housing needs of the Borough. Additionally, Dacorum is highly constrained by the Green Belt and therefore, any development strategy that involves any outward expansion of the towns and larger villages will inevitably necessitate the release of Green Belt land.
Included files	
Title	Housing Delivery
ID	EGS2586
Person ID	1144499
Full Name	Mr Robert Emberson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Officer Comment	
Housing Delivery comment	<p>Design & Materials</p> <p>With regard to the appearance of building materials. There is a tendency in new estates to use strident bright red colours both for brickwork and tiled roofs. The effect is to make the dwellings stand out like sore thumbs, even at a distance. However if softer coloured materials are used the dwellings sit much more gently in the landscape. This is particularly true of roofs. If a mix of soft tile colourings is used a pleasing mottled effect is produced and even newly built homes look as if they have been long established.</p>
Included files	
Title	Housing Delivery
ID	EGS2599
Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>We sympathise with the problem of producing a plan against the background of proposed changes to the national policy framework, but given that uncertainty the Plan cannot afford to have any ambiguity about its relationship with that framework. For example, in the introduction to the main Plan document it states (1.8):</p> <p>“Although it is unclear how the Government will respond to the consultation [regarding the white papers on Planning for the Future and Changes to the current planning system] we have already taken some steps to reflect some of the proposals. These included ... introducing the simplified zoning categories”.</p> <p>But in the section dealing with National Policy reforms (14.8) there is no reference to the impact of zones, and in the Green Belt and Rural Area Topic Paper it states (s2.27):</p>

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

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

- given the uncertainty around house targets (see below) there is no clarity about what might happen were the plan to be adopted but the housing target reduced, since our understanding of the white paper proposals are that once an area is defined as a growth zone in an adopted local plan there is in principle agreement for the location, use, and amount of development on a site.

- there is no clarity about what might happen to the growth zones identified in the Plan if the amount of windfall housing exceeds the 2,400 estimated in the sources of housing land supply. Given that we are already aware of two proposed developments totalling 1,500 houses (21/00171/SCE 400 houses along Leighton Buzzard Rd and 1,100 homes in the Bulbourne Cross development near Berkhamsted) which don't feature on land identified for growth in the Plan this appears to be highly likely.

- there is virtually no reference in the Plan to protection zones.

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

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

Included files	
Title	Housing Delivery
ID	EGS2630
Person ID	222269
Full Name	Georgina Tregoning
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	

Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS2641
Person ID	1263231
Full Name	Mr Phil Robinson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS2656
Person ID	1263235
Full Name	Mrs Vanessa Robinson
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS2668
Person ID	1161597
Full Name	Stuart Mears
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>

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 Housing Delivery

ID EGS2677

Person ID 1263237

Full Name Dr Alice Mears

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Officer Comment OBJ HOUS

Housing Delivery 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 Housing Delivery

ID EGS2686

Person ID 1263240

Full Name Stuart and Val Burnett

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS2695
Person ID	1263241
Full Name	Mr Stephen Hurley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery 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 Housing Delivery

ID EGS2707

Person ID 1263245

Full Name Mr Paul Barritt

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ HOUS

Housing Delivery 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 Housing Delivery

ID EGS2724

Person ID 1263254

Full Name Teresa Finnigan

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	no housing should be built on Green Belt end of, need to find more brownfield sites or build up in the town centre where facilities are currently readily available
Included files	
Title	Housing Delivery
ID	EGS2740
Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	70 dph (net) or 30% uplift for Berkhamsted seems very high. New permanent residential moorings MUST BE offline. DM15 - Residential moorings outside urban areas are outrageous. This must not happen.
Included files	
Title	Housing Delivery

ID	EGS2771
Person ID	1262722
Full Name	Colin McCready
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS2794
Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	DM2 - Affordable Housing. The Housing Needs Assessment indicates that the total number of houses required that are affordable to rent + those that are affordable to own, that is (363+248) / 1023 indicates that 0.6 or 60% of new dwellings need to be affordable. This is considerably less than the 40% proposed and suggests that the current strategy, although providing more affordable homes than in the past, will not help close the gap between provision and unmet need. In fact

it will continue to grow. If fewer large homes for sale or rent at market price were constructed and a greater proportion of one and two bedroom homes **of good size and proportion** (N.B. a bedroom of 10' x 10' is way too small) were built for sale at market price that are attractive and *ring-fenced* for older local home owners, then older residents may be tempted to downsize, releasing large homes to the market to compensate / provide follow on homes. **The % build of affordable housing should be increased to 60% and a greater proportion of bungalows suitable for the elderly built out of the private market allocation.**

I fully support the Policies DM3, DM4 and DM6

Policy DM5 d and DM7 (4) amend to ".....retaining trees, shrubs *and hedges* to minimise the dominance of car parking...etc.

DM8 Custom and self-build homes should be set aside for individual owner -occupied homes or small-scale development to meet social housing or specialist need such as sheltered accommodation. Flat complexes should be assessed to ensure they are in-keeping with and not dominating surrounding homes.

DM10 - the provision of wheelchair accessible housing is very important and often needed at short notice. As someone who worked in care services I know that there are many individual wheelchair users and families with wheelchair users who are struggling in poorly adapted homes. If collaborative cross-county unmet need is also taken into account these purpose built homes will be snapped up.

DM11 (1)- I am in favour of increasing density through extending and adapting existing dwellings and where local topography or tree-cover shields a site from majority view, but I believe that a density of 100dph, where this is above five storeys, is too high and depressing. I also believe that for town centres, careful vetting of proposed design to ensure it is in keeping with the character of the town centre is essential. Parts of Berkhamsted town centre were ruined by poor and prominent design which would be encouraged by a 70% density. It is important this is not repeated slavishly across the Borough. Lower densities are preferable.

DM11(2) - It is significant that wider environmental issues such as flooding and biodiversity improvement / conservation areas (including buffer strips) are not specifically listed in the adverse effect group of local circumstances for which density could be reduced. Please include them.

DM 11 (4) On allocated sites where there is a public challenge to the net capacity of sites listed in S24, the public will expect those concerns to be taken into account and the net capacity reduced.

DM 12 To facilitate wheelchair access and mobility issues, housing designed for the elderly, wheelchair users or hoist-users should be tending towards the maximum size to allow for ease of movement, wet room space and space for equipment disability equipment.

A bedroom for an elderly person should be at least 3m x 3m in size. Less than that and there is not enough room to get in a double bed, side units and wardrobe with room to move around easily.

DM14 2d Add refuse collection to the list of facilities to ensure travelling families are not stigmatised by concerns over refuse disposal.

Title	Housing Delivery
ID	EGS2816
Person ID	1263287
Full Name	Jeremy Bonnar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS2852
Person ID	1263198
Full Name	Jillian Hipson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Officer Comment	
Housing Delivery comment	There is a clear need for more affordable housing and social housing in Dacorum. This should be built on brownfield sites, rather than Green Belt land. If a developer is given permission to build houses, they should be requested to build the affordable housing first and then the posh houses - which again should not be on Green Belt land.
Included files	
Title	Housing Delivery
ID	EGS2855
Person ID	1263364
Full Name	NEIL BOUSTRED
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	<p>I am against the scale of development proposed in this Draft Plan and I call on DBC to redraw this plan based on more recent up to date housing target estimates.</p> <p>I question where the evidence has come from for this massive infrastructure change for Dacorum.</p> <p>The document highlights the greatest opportunity for change since Hemel was designated a New Town after WW2. As you're aware, this was not to satisfy a local demand but to assist London with housing post the Blitz.</p> <p>I agree that Dacorum requires further affordable housing for both the elderly and the younger generation but there is not a local need for this level of development. These proposals will actually serve those from outside the area to move to Dacorum rather than look after those wishing to stay local who require affordable housing. That need could be met through the building on brownfield/ town centre sites. The young and the elderly do not wish to be based on the outskirts of a town with minimal amenities.</p> <p>Your policy document discussed the environment and the Green Belt, though there is obviously no genuine desire to protect these areas, both of which will be decimated by this scale of housing and infrastructure development. Commuting and road use will increase as the area soaks up further migration to its towns and villages. The Green Belt was designated</p>

for a specific reason, again post WW2: it was initially introduced to protect the Home Counties from overdevelopment due to their location close to London. If we are serious about our environment, then this foresight from 70 years ago should not now be disregarded under the banner of progress!

Further environmental consideration must be given to the effectiveness of building on natural flood plains and the erosion of our local farming communities. With a post- Brexit focus on using local produce, rather than the environmental disaster of transporting produce that can be grown locally from around Europe, the building over beautifully productive fields must be counter-productive!

As I state at the beginning, I appreciate that development is required to enhance the area for our communities, but NOT at the extreme level that is proposed!

Please take this opportunity to redraw the plan.

Included files

Title Housing Delivery

ID EGS2860

Person ID 1012318

Full Name Mrs Jane Hennell

Organisation Details Area Planner
Canal and River Trust

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment

Housing Delivery comment

DM 15

Para 14.90. The minor facilities such as sanitary stations and water points are not necessarily off line, and are not residential moorings. This sentence needs to be amended for the purposes of clarity.

14.91. If the Caravan and houseboat dweller needs assessment does not identify any direct need for residential moorings what is the justification for a specific policy relation to residential moorings? There is not a policy for residential caravan parks nor is the conversion of existing caravan parks to residential use covered by any other policy. What is the justification for the policy?

The issues referred to in para 14.92 would be better dealt with in the Canal policy DM 49, (which also covers mooring basins and so replicates much of this policy) and by reference to general policies referred to para 14.93.

14.95 Is it necessary or appropriate to comment on policies relating to third parties in a local plan? The paragraph is factually incorrect and should be removed.

Policy DM15 part (a) Why a blanket approach of 50% for moorings to remain leisure moorings? Surely this matter must be considered on a case by case basis, depending on the proposal, location and other policies within the plan? What evidence and justification is there fore this approach?

The Canal & River Trust strongly recommend that further discussions take place in relation to the Council's approach to all types of moorings.

Included files

Title

Housing Delivery

ID

EGS2875

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

Yes

* Yes

* No

Officer Comment

Housing Delivery comment

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

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

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

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

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

- given the uncertainty around house targets (see below) there is no clarity about what might happen were the plan to be adopted but the housing target reduced, since our understanding of the white paper proposals are that once an area is defined as a growth zone in an adopted local plan there is in principle agreement for the location, use, and amount of development on a site.

- there is no clarity about what might happen to the growth zones identified in the Plan if the amount of windfall housing exceeds the 2,400 estimated in the sources of housing land supply. Given that we are already aware of two proposed developments totalling 1,500 houses (21/00171/SCE 400 houses along Leighton Buzzard Rd and 1,100 homes in the Bulbourne Cross development near Berkhamsted) which don't feature on land identified for growth in the Plan this appears to be highly likely.

- there is virtually no reference in the Plan to protection zones.

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

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

Included files	
Title	Housing Delivery
ID	EGS2927
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS2970
Person ID	1164709
Full Name	Dianne Pilkington
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS2983
Person ID	1258924
Full Name	Natalia Maghdoori
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS3079
Person ID	1263499
Full Name	Mrs Angela Burgin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery 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 Housing Delivery

ID EGS3121

Person ID 1263514

Full Name SAM LETHEREN

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Officer Comment OBJ HOUS

Housing Delivery 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 Housing Delivery

ID	EGS3142
Person ID	1263526
Full Name	MR NICK RIPPER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS3166
Person ID	1263537
Full Name	MRS SARAH RIPPER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS3223
Person ID	1263566
Full Name	Frances Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Officer Comment	NOC
Housing Delivery comment	
Included files	
Title	Housing Delivery

ID	EGS3340
Person ID	1261609
Full Name	DEBORAH CROOKS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS3348
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I am not convinced that mixing a range of houses (affordable through to the more expensive) produces the right communities for both those that buy the affordable properties nor those that can afford the more expensive ones. There should be an effort to group types of houses into similar communities.
Included files	
Title	Housing Delivery
ID	EGS3364
Person ID	1263693
Full Name	Ruth Colderwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS3406
Person ID	1263124

Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	No Comment
Included files	
Title	Housing Delivery
ID	EGS3427
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent is supported. However, this is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery

ID	EGS3496
Person ID	1207786
Full Name	Anne Foster
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ DM2 BKDS HOUS - NPPF ZONAL
Housing Delivery comment	<p>DM2</p> <p>I'm not sure if a Borough wide Strategy is appropriate when there is a wide discrepancy in house prices in the different areas of the Borough .</p> <p>Houses in Berkhamsted for instance are at a premium price, therefore it is an attractive place for developers to build, preferably on large greenfield sites and whilst the commitment to 40% affordable housing is welcomed, at the generally accepted 20% discount they are far from affordable for most. However I note the provisions of DM2 and the commitment to a significant proportion of properties at social and affordable rent.</p> <ol style="list-style-type: none"> 1 <i>Affordable housing provision will be expected to incorporate a mix of tenures taking into account the Council's most up to date evidence on housing need. No more than 25% of all housing will be First Homes. The rest of the affordable housing will provide rented accommodation, comprising social rented and affordable rented properties.</i> 2 <i>All affordable housing should be genuinely affordable, with the expectation being that the cost will need to be substantially more than 20% below local market prices and rents.</i> <p>The desire for Developers to build large “ executive” homes to maximise profits whilst meeting affordable targets means that houses are bought up by people from outside the area, often London; local need is not addressed, and out -commuting is inevitable.</p> <p>As long as affordable homes are developer dependent the situation will not change. Is there an option to return to building council homes at genuinely affordable rents?</p> <p>I am concerned about the adoption of the zonal classifications in the Planning for the Future White Paper, which are as yet not fully defined and which carry ongoing implications for the planning process and public consultation, in advance of full implementation of its revised processes in relation to Local Plan production.</p>

Included files	
Title	Housing Delivery
ID	EGS3535
Person ID	1263834
Full Name	Michael Illes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	National Policy - the leaning towards using green belt is flawed and I was under the impression that the government had now changed policy with regard to this. I appreciate the development of some open spaces into more socially viable places for people and, in some cases, nature.
Included files	
Title	Housing Delivery
ID	EGS3538
Person ID	1263821
Full Name	Anne Isherwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	

Housing Delivery comment	The number of additinal houses is too high.
Included files	
Title	Housing Delivery
ID	EGS3561
Person ID	1263797
Full Name	Chloe Collins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>We are encouraged that the proposed policies maintain and support the current Settlement Hierarchy with specific policies for Rural Areas and continue to recognise that the countryside in Dacorum is the least sustainable location for major new development in the borough and therefore will remain an area of development restraint.</p> <p>We are however extremely concerned that the Sustainability Appraisal suggests that if the proposed release of Greenbelt land for growth fails, for whatever reason, a fallback position of major development abutting Long Marston could be applied. TRPC would not support this option.</p> <p>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.</p>
Included files	
Title	Housing Delivery

ID	EGS3581
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS3588
Person ID	1257698
Full Name	Peter Block
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The only pressing need is to increase the supply of affordable housing. There is no need to provide new-build private housing other than as direct replacement or infill. 100% of all new developments should be 'affordable'. At the present

time, developers are gobbling up parcels of land, intent on maximising profits, and renegeing on promises to provide affordable housing.

Affordable housing should make provision for working from home, and a quiet area for study.

Included files

Title Housing Delivery

ID EGS3602

Person ID 1263865

Full Name Robin McMorran

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment

Housing Delivery comment NO! This is desecration of the precious green belt.

Included files

Title Housing Delivery

ID EGS3632

Person ID 1263885

Full Name Mr Neil Roberts

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS3656
Person ID	1263890
Full Name	Chris Munday
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	
Housing Delivery comment	You have overstated the numbers of houses required substantially and have not set out the reasons why. Your approach will have a significantly detrimental affect on the nature and character of Tring. You do not explain why or give an effective rational and to the reasons why. Similar levels of development have not been proposed for other market towns with better travel links
Included files	
Title	Housing Delivery

ID	EGS3708
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	35% affordable cheap housing is not enough. they will be built to poor standards and corners will be cut. just look at any of the new developments and how they look now. the majority are falling apart within 10 years
Included files	
Title	Housing Delivery
ID	EGS3725
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	

Title	Housing Delivery
ID	EGS3765
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>A 24% increase (more than 900 houses) in housing proposed in Berkhamsted is unsustainable and is more than this small market town can tolerate. The Council is using outdated (2014) ONS housing projections . The most recent ONS Data (2018) suggests only half of this is needed.</p> <p>Please DBC, challenge the proposed housing numbers. These are dictated to us by central Government and you don't need to accept them.</p>
Included files	
Title	Housing Delivery
ID	EGS3768
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS3816
Person ID	1263924
Full Name	Susan Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>I do believe that tackling environmental issues, regeneration and well being are at the heart of any arguments against concentrated building plans in Hertfordshire.</p> <p>We need to think of the consequences of such schemes on our resources such as water, green space for nature to flourish and air quality.</p> <p>Lockdown has taught the working generation that proximity to London is no longer a requirement now that the success of working from home or a local hub is established.</p> <p>We have an obligation to redress inequality in the UK. Many towns in the North, South West and along our coasts, that have suffered years of neglect, should have funds diverted from the South East building projects in order to attract young people and small businesses to affordable, desirable, refurbished properties, so that communities can once again flourish and thrive.</p>

An overpopulated South East alongside deprived empty shopping centres in overlooked towns up and down the country is an irresponsible response to the future prosperity of the UK.

Progress should be measured by putting the well- being of people living alongside nature in decent, regenerated towns and villages with character that build vibrant communities across the UK.

We need to remind councils and politicians about their obligation to 'Level Up'; to provide a better environment for all across our country; to sustainably transform existing housing, shops and business premises and bring an end to out of town New Build.

It is time to be innovative and make better things happen for everyone now.

Included files

Title Housing Delivery

ID EGS3837

Person ID 1263468

Full Name Bruce Day

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment

Housing Delivery comment

The consultation documentation says "subject to a number of exemptions, at least 10% of the homes should be available for affordable home ownership for major development where housing is proposed". This appears not only minimal but also ignores the problem that the Government policy to "delivery of beautiful and well designed homes" will inevitably lead to further problems in providing genuinely affordable homes to those in real need. Dacorum needs to take a much more inventive approach to the really necessary affordable homes rather than what now appears to be a volume oriented housing policy. I believe that SP4 needs revision.

Included files	
Title	Housing Delivery
ID	EGS3859
Person ID	1263989
Full Name	Lauren Ashton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – INFR AHST BER
Housing Delivery comment	Failings 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	Housing Delivery
ID	EGS3866
Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	

Housing Delivery comment	Too many new homes being built in Berkhamsted, you are ruining our town
Included files	
Title	Housing Delivery
ID	EGS3893
Person ID	1263998
Full Name	Mrs Lara Dixon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	Developers offer affordable housing as part of their proposals in an attempt to help local people and their children stay in the area. What is "affordable" ?? I doubt that the proposal of 80% market means that most people in the local population will be able to afford to buy these properties. Therefore, they are not benefitting those families that already live in the area, instead attracting people who are migrating out of London.
Included files	
Title	Housing Delivery
ID	EGS3937
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I support that new homes on sites of 10 or more homes are Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, and will that number really be achieved?
Included files	
Title	Housing Delivery
ID	EGS3948
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>Priority and confirmation must be given to affordable and social housing provision in the plan. I have never felt that plans including such housing have been adhered to in Berkhamsted with a change of provision being allowed at the last minute. Consequently young people cannot afford to live in the area. I am concerned too that any housing including a token few affordable homes will be stuck out of town and away from better transport links for those that cannot drive having looked at the different locations in Berkhamsted for example</p> <p>Post pandemic can the change of use of warehouses and office space in particular as well as some shopping areas be put to better use for housing? It would be helpful to see supporting evidence in the plans for such consideration</p>
Included files	
Title	Housing Delivery
ID	EGS3970
Person ID	1263440

Full Name	J Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS4039
Person ID	1261199
Full Name	Will Bentley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The total number of houses proposed is completely disproportionate to the ONS's latest (2018) projections for future housing requirement across the borough, and have been based on an outdated projection from 2014 manipulated to derive a similar 'requirement' as the dubious algorithm previously used. Furthermore, the plan appears to disregard in its entirety the National Planning Policy Framework which allows local authorities to restrict the scale of development due to, amongst other things, the impact on the Green Belt and AONB.
Included files	

Title	Housing Delivery
ID	EGS4100
Person ID	1264210
Full Name	Fiona Fulford
Organisation Details	myself
Agent ID	1264200
Agent Name	Fiona Fulford
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	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. Also sustainable infrastructure such as cycle lanes, recycling points etc
Included files	

Title	Housing Delivery
ID	EGS4108
Person ID	1264243
Full Name	Howard Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	

Housing Delivery comment	The data for housing requirements appear based on data from 2014, rather than a rigorous appraisal of the latest 2018 ONS data,
Included files	
Title	Housing Delivery
ID	EGS4136
Person ID	1262892
Full Name	Jean Farrer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP HOUS OBJ HOUS BKDS SUP ONEV
Housing Delivery comment	I support your attempts to secure a level of affordable housing. There is little evidence that this is being achieved in Berkhamsted, although Bearroc phas 2 does seem to be a bit more realistic. Frankly, developers are very good at wriggling out of these commitments and relocating their quota elsewhere. I support the One Voice Alliance submissions in this section.
Included files	
Title	Housing Delivery
ID	EGS4165
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I fully support a concentration on affordable housing but, historically, Berkhamsted does not have a good record of providing these.
Included files	
Title	Housing Delivery
ID	EGS4205
Person ID	1264269
Full Name	Paul de Hoest
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>Numerous local groups have commented on this consultation including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party to name a few. I agree with the stance taken by all of these groups. The fact that all these (and there will be others) are providing the same substantive message from the local population to you should demonstrate that these proposals do not have the support of the people. I do not propose to add to your reading burden by rehashing all of their points but I do make the following observations.</p> <p>This plan is intended to last 18 years. But we know that projections of housing need change all the time. This plan, rather ludicrously, is based upon 2014 ONS projections whereas the 2018 ONS projections would suggest a build rate less than half of this total. It is imperative that this plan releases Green Belt land in stages and does not release all at once to create a one-time bonanza for the building industry. I suggest releasing in five year tranches and this would protect</p>

the Green Belt and existing towns from overdevelopment if circumstances change (which they are likely to do post covid, post Brexit, post "levelling up").

Included files

Title Housing Delivery

ID EGS4206

Person ID 1264301

Full Name James Stringer

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment

Housing Delivery 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 Housing Delivery

ID EGS4217

Person ID 1263248

Full Name Johnjo McDermott

Organisation Details

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

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

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

Summary

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

Included files	
Title	Housing Delivery
ID	EGS4261
Person ID	1261915
Full Name	Eleanor Lovett
Organisation Details	Landhold Capital
Agent ID	1261754
Agent Name	Eleanor Lovett
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>Policy DM1 – Mix of Housing</p> <p>Whilst Landhold Capital recognise that the Framework requires planning policies to deliver a range of size, types and tenures of housing, the policy as currently drafted does raise some concerns. This is principally in relation to inclusion of Table 5, which is referenced as housing mix to be secured across the borough. However, it is not clear why this is included in the policy, as the Council will presumably not be seeking to apply this mix to every site. This table would be better placed in the supporting text, as it could wrongly be perceived to represent a requirement for each site if included in the policy, with text used to make it explicitly clear what these percentages relate to.</p>

It is not considered appropriate for the plan to require a specific housing mix on development sites, as the requirement for different types of dwellings is likely to fluctuate over time and in different areas of the Borough. As such, whilst the use of a policy requiring a mix of houses is appropriate in order to encourage variety within developments, the Council should avoid adopting a prescriptive approach through this policy.

It is also noted that the second element of the policy as currently drafted includes mention of Gypsy and Traveller pitches. It is not clear whether it is the Council's intention to seek all of the criteria set out in that part of the policy and therefore require Gypsy and Traveller provision on all sites, however if this is the case then this is a concern. The Council has a duty to specifically identify sites for such provision and it should not seek to address this requirement by requiring provision on all development sites. Furthermore, there will be sites where it is not feasible or viable to include such provision, or where it is not appropriate due to site constraints or the requirement to deliver other infrastructure. The wording of the policy should be modified in order to make it explicitly clear when the Council expects those different types of provision to be made, as well as to recognise that it may not always be possible to deliver all elements on every site.

Policy DM2 – Affordable Housing

Table 6 of the Plan sets out a requirement for 611 affordable units each year in Dacorum, taken from the SW Hertfordshire Local Housing Needs Assessment. This demonstrates a very high level of affordable housing need locally, and a level that is certainly not going to be met in full based on a housing requirement of 922 dwellings per annum. The LHNA recognises that the figure of 611 was not intended as a target, but it does conclude:

“Such is the scale of affordable housing need that the local authorities should seek to deliver as much affordable housing to rent as viability allows.”

Clearly, it is possible to increase affordable housing delivery by either increasing the requirement for each site, or increasing the total amount of housing to be delivered. In the case of the former, there is only so far that the requirement can be increased to without compromising the provision of other infrastructure or the viability of development, which negatively impacts on delivery. However, there is the argument that in areas which have high levels of affordable housing need, it is possible to increase housing delivery overall in order to ensure that higher numbers of affordable units are delivered.

The Council should also be mindful that in the case of windfall sites, particularly those that involve only a handful of dwellings through infill development, will not deliver affordable housing as sites less than 6 homes in the AONB, and less than 10 homes elsewhere will not be required to fulfil that requirement. This is a factor that should be considered when relying on windfall sites as a significant source of housing supply.

In terms of the policy provisions, whilst on the whole Landhold Capital is supportive of the policy and the requirement proposed, it is noted that the part 1c) of the policy suggests a requirement for 100% of homes to be affordable on rural exception schemes. That conflicts with Paragraph 77 of the Framework which states that authorities should support opportunities to provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this. As such, it is considered that policy DM2 should be modified to remove the requirement for 100% affordable housing to be delivered on rural exception sites. It is noted that Policy DM3 as

currently drafted does not include such a requirement and provides more flexibility in terms of what can come forward under this mechanism.

Policy DM11 – Density of Development

Landhold Capital is concerned that whilst Policy DM11 appears to be generally aspirational in terms of increasing densities in the Borough's urban areas, no target is set for development elsewhere in Dacorum (ie not in the Borough's towns) other than to maintain density with any uplift considered on its merit. This is not an aspirational approach and hard to measure in many cases as density will vary significantly within settlements, with the potential for this policy to be used as justification for the refusal of development proposals that would actually reflect highly sustainable patterns of development in accordance with chapter 11 of the Framework.

The Council's approach to calculating densities is set out in the supporting text on p74 of the emerging Plan that the mean density should be calculated on development within 100m of the site. Whilst this may be appropriate in ensuring that future development is appropriate in the context of existing built up areas, in some cases this might represent very low density development with an uplift still representing inefficient use of land.

Paragraph 123 of Chapter 11 of the Framework must be considered, as it relates to areas where there is an existing or anticipated shortage of land for meeting housing needs, which is relevant to Dacorum as an authority unable to demonstrate a five year housing land supply and constrained by the Green Belt. The Framework requires plans to contain policies to optimise the use of land and contain standards that should seek a significant uplift in the average density of residential development unless there are a strong reasons why this would be inappropriate. It also suggests the use of minimum density standards, which is an approach that could be considered by the Council as a mechanism to ensure that development effectively uses the available land within the Borough. Including minimum densities would be an appropriate way to ensure consistency with the Framework and therefore be found sound in accordance with the requirements of Paragraph 35.

Included files	
Title	Housing Delivery
ID	EGS4292
Person ID	1264321
Full Name	David` Fox
Organisation Details	personal
Agent ID	1264318
Agent Name	David Fox
Agent Organisation	
Yes / No	No

* Yes	
* No	
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS4316
Person ID	1264325
Full Name	Olivia Halper
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>14.69 Density is crucial to achieving modal shift aspirations/shift to sustainable modes of travel, creating walkable and more vibrant places. This point needs to be made.</p> <p>DM14: It is not clear from the policy or supporting text how the sites for additional gypsy and traveller allocations have been selected. Why West of Hemel Hempstead and Marchmont Farm? Why has North Hemel been ruled out? We consider that the location of new Gypsy and Traveller pitches in the HGC area should be considered as part of the HGC Framework Plan, and this be used to inform which of the Growth Area sites should accommodate the pitches required.</p>
Included files	
Title	Housing Delivery
ID	EGS4416
Person ID	1264229
Full Name	Brian Dixon

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV, HOUS
Housing Delivery comment	<p>Further to my e mail to yourself on Thur. 18 Feb.2021, wishing to confirm that the Dacorum Council will intend to be working, to the Self-Build & Custom House Building 2016 ACT and promulgating this from within the Dacorum Local Plan 2020to2038 & expressly quoting this in the “Policy DM8-Custom and Self Build Housing” section on page 70 of the Local plan.</p> <p>Meanwhile having ploughed through what is a not an inconsiderable sized document, I have some more queries & would be obliged if you would enlighten me about the following:</p> <ol style="list-style-type: none"> 1 Would you add the “Self -Build & Custom House Building 2016 ACT” (in full) into the “Housing Delivery” section, page 7 of the “Policy Booklet” aside of the sentence for the mentioning of “sites for travelling communities.” I mention this since the Councils policy of complying with the 2016 ACT may otherwise appear to place little credence on its intent to, in fact, comply with this mandatory ACT, placing more emphasis on arias, not unimportant, but diverting from the Self Build & Custom Build details. 2 Does the “Affordable Housing” referred to on page 61 of the Dacorum Plan contain any Self-Build & Custom Build Houses in it or are they completely separate quantifiable entities? 3 In Table 2, page 37 of the Dacorum Plan, “Total Existing Commitments” of 2,708 Homes, has there been any “Self-Build & Custom Build allocation against these 2,708 Homes, in accordance with your policy DM8 on page 70 of the Dacorum Plan, i.e. “On housing developments with 40 or more new houses 5% of the house plots should be made available on site as serviced building plots to enable the delivery of self & custom build properties”? <p style="padding-left: 40px;">Also have any S106 Agreements been raised against any of the 2,708 Homes?</p> <ol style="list-style-type: none"> 1 In paragraph 23.70 on page 207 of the Dacorum Plan, “There will be a minimum of 11,000 homes, of which 3,-4000 will be affordable” have any Self Build & Custom Build home allocations been made from these homes similar to the “affordable” ones? 1 In accordance with the Self-Build and Custom House Building ACT 2016 the following two procedures are detailed in the ACT. 1 The level of demand for Self Build & Custom Build on the “Self Build Register” should be revealed on the Councils Self Build Web Page Portal. Dacorum do not declare any demand numbers on their Web Page Portal!

1 “Relevant authorities should also consider informing those on the register when they have permissioned suitable land. I do not know of any Dacorum procedure with which this could be carried out, nor do I know of anyone, over the 4 years I have been on the Register, to have been offered a Self Build Plot, the number on the Register to date being 150.

Included files

Title Housing Delivery

ID EGS4419

Person ID 1264229

Full Name Brian Dixon

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment NOC, OBSV

Housing Delivery comment Is the Custom & Self-Build housing referred to in the above Plan & specifically in the “Housing delivery” section, page70, Paragraph 14.60 to 14.61, to be in accordance with the “Self - Build & Custom Housebuilding, Housing & Planning Act 2016”.

Included files

Title Housing Delivery

ID EGS4455

Person ID 1264316

Full Name Melanie Turner

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS4475
Person ID	1264399
Full Name	Miss Sarah Battersby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	SUP – HOUS EMPL
Housing Delivery comment	<ul style="list-style-type: none"> • I support development for housing, employment or leisure on brownfield sites • I do not object if people wish to build a small number of homes in their garden. • I would like to see that each approved housing development sites has a mandatory planning requirement, which is that 10% or more of the homes built must be social housing and/or 'starter' housing, as these will be of greatest benefit to people from the area. Most houses on the new estates are too expensive for young couples and there is unmet demand from single people of all ages for affordable housing.
Included files	
Title	Housing Delivery
ID	EGS4526
Person ID	1261836
Full Name	Richard Sutton

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

These are fundamental flaws in the strategy underpinning the 'Dacorum Local Plan (2020-2038) Emerging Strategy for Growth'. As such, this plan should be rejected outright, and a new plan drawn up that addresses the actual needs of the area for today and the long-term success of the Borough.

These points are expanded below.

Incorrect Assumptions for Housing Provision

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

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

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

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

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

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

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

Failure to Provide Adequate Supportive Infrastructure

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

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

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

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

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

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

Impact on Green Belt and Other Designated Land

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

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

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

You are now faced with a personal choice.

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

Included files

Title	Housing Delivery
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ID	EGS4578
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Person ID	1145918
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Full Name	Mr Richard Tregoning
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Organisation Details	
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Agent ID	
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Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	A Totally benign objective but not possible when the basis of planning is made on the flawed growth figures of 33% (16,516 house) for a population of 135,000. The plan needs to be withdrawn so that a real debate can take place on real figures supported by Local and National Government
Included files	
Title	Housing Delivery
ID	EGS4598
Person ID	1264455
Full Name	Tom Hewitt
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>As a Tring resident i am particulalry interesrted in the increase in housing based in Tring. Table 14.74 says that if a town has a density of 70 dph that the development will maintain that level of density. Is that wise considering the size of Tring? As a small village/town if you increase the size of the town by the proposed 55% with the same density as the rest of Tring (which is mainly based on an old victorian density and also stacked 1960s council housing) you'll completely alter the fabric of the village. Wouldn't it be prudent to make the new developments of significantly lower density to ease the number of cars in the area.</p> <p>If you maintain that level of density the amount of cars on the already crowded roads will make it impossible to traverse through the town. The centre of the town is primarily based on turn of the century design and the roads reflect that. There is one particular pinch point by the houses opposite the Silk Mill on Brook street. If you develop houses based on the</p>

land between Bulbourne road and station road, as well as the land by Tring brewery, you'll have increased cars using that road as a cut through. I think you need to develop a trunk road running between those two main roads to allow more cars to bypass the town centre on the northeast side.

Included files	
Title	Housing Delivery
ID	EGS4637
Person ID	1264483
Full Name	Peter and Miriam Yarrien
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ HOUS TRI
Housing Delivery comment	Affordable Housing: The Plan states that DBC want to “increase the number of new and truly affordable homes”. Creating new homes seems very straightforward, but making them affordable appears to be a very difficult objective, especially in areas such as Tring. The new development currently proceeding on Roman Park, Icknield Way comprises of 226 houses and the cheapest currently advertised is £495,000, although there will be smaller dwellings with a price of £399,000 being built later. This price tag represents around 12 times the average yearly income in the UK, which is well outside the scope of “affordable” for the majority of young people that should be the target for such houses. This is even more relevant now with many high loan-to-value mortgages being withdrawn recently. The strategies for provision of appropriate and affordable housing need to be the subject of imaginative review and reform. How will Dacorum Borough seek to make available truly affordable housing in the correct locations?
Included files	
Title	Housing Delivery
ID	EGS4652
Person ID	1263004
Full Name	Jill Townsend

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS4702
Person ID	1264495
Full Name	Ian Fyfe
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS HGC BER TRI HECH
Housing Delivery comment	<p>Density of Development .</p> <p>The plan compares the density of development in Hemel, Berkhamsted and Tring as measured by dwellings per hectare and proposes planned minimum levels for future construction.</p> <p>Hemel</p> <p>Tring</p>

Berkhamsted
 Town centre - current
 122
 79
 44
 Town centre - planned
 >100
 >70
 >70
 Other areas - planned
 >40
 >40
 >40
 Comment.

Using towns with completely different characters as justification for common planning density targets is completely unrealistic. Density of development should take account of the character of the existing town, not make it like its neighbours. Finally, I question the very basis on which the plan has been developed. Where is the evidence to support the need for housing to that extent in Dacorum and the proportions and sizes of the different types of dwellings. I am deeply concerned that the scale of development proposed would destroy the character of the town.

Included files	
Title	Housing Delivery
ID	EGS4799
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	
Housing Delivery comment	Numbers are too great for the locality to bear.
Included files	
Title	Housing Delivery
ID	EGS4818
Person ID	1264519
Full Name	Neil Burton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	
Housing Delivery comment	The figures being suggested do not seem correct when looking at the latest ONS data which suggests that the number of houses needed would be closer to 350 per year. This figure of almost a thousand houses will ruin green belt needlessly. The plan is a developers dream especially with Dacorum having an out of date local development plan. This feels to me like there is a massive gap between the data being used from 2014 and current accurate data. The local community will lose out and lots of money will be made by a few people. I believe we should develop brown field sites of which there are many but with this plan comes the possibility for corruption to build unnecessary housing.
Included files	
Title	Housing Delivery
ID	EGS4824
Person ID	1257705
Full Name	Mark Barfield
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>Given the 55% growth of housing supply proposed within Tring in comparison to the 9% growth in population expected in Dacorum across the plan period. Given that it is clear on the basis of allocation alone that the proportion of growth to Tring is disproportionately higher than the expected population growth, I strongly object to the concentration of the delivery strategy in terms of the scale of development of Tring.</p> <p>There is a lack of evidence to justify the release of Green Belt land for the housing need delivery strategy, represented by the proposed allocation of sites Tr01, Tr02 and Tr03. Exceptional circumstances are required to justify the loss of Green Belt land for housing. The Council has failed to identify exceptional circumstances. The delivery of houses within Tr01, Tr02 and Tr03 would offer irreversible harm to the openness of the Green Belt and AONB, that which should be provided substantial weighting of harm as defined within the Framework. The collective benefits to outweigh such substantive harm has not been successfully identified by the Council so as to justify the loss and therefore the policy is not fit for purpose. I object to draft policies SP23 and SP24 on this basis.</p> <p>The allocation of sites Tr01, Tr02 and Tr03 would cause substantial harm to both the allocated site but also surrounding Green Belt land, destroying their openness and sense of permanence in a manner that has failed to be justified in accordance with Paragraph 136 of the Framework.</p> <p>To step outside of the requirements identified within Paragraph 11 of the Framework for Plan making the Council has to provide exceptional reasons why they have to impact so negatively towards their environmental objectives. Until such a time when an assessment of the housing opportunities available within the existing settlement boundaries associated with Tring are undertaken, in conjunction with the further full assessment required to assess need for the borough, the delivery strategy remains inappropriate and as such the proposed allocation of Tr01, Tr02 and Tr03 is completely unjustified.</p>
Included files	
Title	Housing Delivery
ID	EGS4837
Person ID	1264531
Full Name	PAUL KENT

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS4865
Person ID	1264524
Full Name	Karen Kang
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	

Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS4869
Person ID	1264533
Full Name	MAURICE OKEEFFE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS4889
Person ID	1150594
Full Name	Catherine and Mark Richardson
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS4902
Person ID	1264536
Full Name	Mr George Harvey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS4906
Person ID	1264537
Full Name	KATHERINE COURTNEY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery

ID	EGS4924
Person ID	1264540
Full Name	JOSEPH DAWSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS4934
Person ID	1260771
Full Name	JAMIE BELL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS4947
Person ID	1264546
Full Name	Dr Calvin Veeroo
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>

Included files	
Title	Housing Delivery
ID	EGS4966
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent ID	1264539
Agent Name	Bethan Fox
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS4973
Person ID	1264548
Full Name	Mrs Sasha Godfrey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS4992
Person ID	1264549
Full Name	Mrs Kate Carter
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS5001

Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p><i>"A key objective of the Plan is to deliver balanced, mixed and inclusive communities, embracing a mix of dwellings sizes, tenures and types including provision for custom and self build and for an ageing population and delivering a minimum of 35% affordable housing."</i></p> <p>I support the provision of affordable housing in Berkhamsted and <i>balanced, mixed and inclusive communities</i> - not just expensive executive housing of which there is ample provision. This should be provided on each site and developers should NOT be permitted to argue that it is unviable and only large expensive houses can be built in Berkhamsted. We have the experience of that happening too frequently and have to question why this is permitted by DBC.</p>
Included files	
Title	Housing Delivery
ID	EGS5034
Person ID	1264557
Full Name	Natalie Crane
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Officer Comment	
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS5057
Person ID	1264258
Full Name	Fintan FitzPatrick
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	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. 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.
Included files	
Title	Housing Delivery
ID	EGS5067
Person ID	1263960
Full Name	Mr Tim Amsden
Organisation Details	Chairman

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I support the idea that housing types should be mixed within the same site, and design should be tenure-blind. There should be no building within the Chilterns AONB. Recent experience is that DBC has failed dismally in protecting the AONB by permitting inappropriate development, viz mini-mansions on Hastoe riding school and the urban sprawl of Gannel Farm.
Included files	
Title	Housing Delivery
ID	EGS5104
Person ID	1264555
Full Name	Rick Freedman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	
Housing Delivery comment	I am in support of this section, and am pleased that sections 14.13-14.15 refer to SWH Local Housing Needs assessment, rather than National Needs. However, the grouping of social and affordable housing, as well as the ineffective definition of affordable housing means it is unlikely that developers will genuinely be inclined to perform their obligations under this section. "Affordable" should

be linked to the average income in the Borough, not average house price, and developers should not be able to buy their way out of these obligations.
 14.70 - Density targets are lower than several approved planning applications already passed by DBC. Reference to acceptable exceptions should be as part of the plan, and confidence that this restriction actually carries any weight needs to be regained.

Included files	
Title	Housing Delivery
ID	EGS5107
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Housing Delivery I applaud the emphasis on First homes, accessible and adaptable homes, well designed homes (who judges that?). There is no mention of homes built to counter climate change, essential given that DBC is committed to being carbon neutral by 2050.
Included files	
Title	Housing Delivery
ID	EGS5113
Person ID	1264550
Full Name	Kevin Fielding
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>In 14.3 you quote Paragraph 145 of the NPPF as if this in some way supports your plan for building largescale over greenbelt land around Berkhamsted (as long as you ensure a portion of these houses are affordable). It does not. Here is the clause from the NPPF:</p> <p>A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:</p> <ul style="list-style-type: none"> a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited infilling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and <p>43</p> <ul style="list-style-type: none"> g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: <ul style="list-style-type: none"> <input type="checkbox"/> not have a greater impact on the openness of the Green Belt than the existing development; or <input type="checkbox"/> not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified. <p>To be clear, none of the above provide any support for large scale green field developments in dacorum, regardless of whether they fulfil a 35% or 10% affordable home criterion.</p>

Also, it is clear that dealocating Green Belt land status to land on the top of the Chiltern Hills with high biodiversity (including Orchids, Bluebells and ancient oaks, skylarks, goldcrests and buzzards) and high public amenity purely on the basis that developments on brownfield sites cannot be made financially attractive if they are forced to provide sufficient affordable homes is not a reasonable approach.

Included files	
Title	Housing Delivery
ID	EGS5160
Person ID	1264509
Full Name	Hannah Fox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	<p>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.</p> <p>Also sustainable infrastructure such as cycle lanes, recycling points etc</p>
Included files	
Title	Housing Delivery
ID	EGS5195
Person ID	1264593
Full Name	Rebecca Mackenzie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Affordable housing is affordable to who? If more housing is needed in Dacorum it is low cost, secure housing. Social housing is what is needed.
Included files	
Title	Housing Delivery
ID	EGS5217
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS5225
Person ID	1262647
Full Name	Carolyn Wallis
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS5261
Person ID	1175740
Full Name	Berkhamsted Schools Group
Organisation Details	The Berkhamsted Schools Group
Agent ID	1175743
Agent Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	
Officer Comment	SUP BER HOUS BK03 PWCG
Housing Delivery comment	<p>We acknowledge the governments potential wider planning policy reforms, but we welcome the fact that DBC are progressing with the local plan on the basis of the current status, as it is required to do so. To await further possible changes could significantly hold up the local plan making process, delay delivery and prevent the flow of community benefits that will come forward from the BSG site allocations.</p> <p>We note the general proposed mix of housing set out in Policy DM1, but this policy requires flexibility based upon changing circumstances over time and individual site characteristics. We agree with the statement that “The housing mix may vary between different sites, taking account of the location and nature of the site.”</p> <p>We consider that it is vitally important that the local plan provides for the delivery of homes that are in line with the type that people want to buy and in the locations where they want to live. The Covid 19 pandemic has reinforced the fact that</p>

the majority of the population wish to live in houses with a garden (and often an office space to work from home) and there has been a reduction in demand for apartments. Government Permitted Development (PD) changes in recent years and currently under consultation go against these principles. The conversion of offices to PD has in many cases created sub-standard flatted schemes in poor environments and the temptation for those who object to greenfield development is to point to greater use of PD as a solution. This is totally contrary to the needs of the population. In the very recent government response to the “changes in the planning system” we totally agree with the following quote.

“We can plan for beautiful homes, with access to the right infrastructure in the places where people need and want to live while also protecting the environment and green spaces communities most value. If we do this well, we can achieve all this whilst giving a new generation the chance to access the homes they deserve.”

The BSG totally supports the provision of affordable housing and confirms that the appropriate proportion and tenure will be delivered, via the early development of the BSG land at Haslam Field BK03. The BSG will accept the final policy position on affordable housing but the final **Policy DM2** content does of course need to be fully justified in terms of both the percentage to be provided and the precise tenure mix. The policy needs to be flexible due to potential changing wider planning reforms such as the First Homes scheme.

The BSG also has an ongoing need for accommodation for teachers, which are increasingly hard to recruit due to the absence of affordable home options in Berkhamsted. The BSG will continue to be open minded as to whether any completed housing at Haslam Fields will be retained for future teacher accommodation which is an added community benefit from this site. Very preliminary discussions have taken place in the past with Hightown Housing Association, but the detail of affordable housing and any teacher housing will follow at a later stage of the process.

Draft **Policy DM8** deals with custom and self-build homes. The proposal is that 5% of the dwellings would be made available for such use. Whilst the BSG will again accept the final policy position in this regard, sufficient proof would be required that there is genuinely enough demand for such a high level of this form of provision across the DBC area. As professional advisors, Aitchison Raffety are sceptical of this. There are also design and timing concerns and it is essential that any custom homes provision fits in with the overall high standard of design of development on site BK03. The receipt from the site BK03 sale will go directly towards investment into local infrastructure into the local community which is considered to be of more benefit than custom homes. Teacher accommodation may be another option in lieu of some custom homes.

Policy DM9 -Housing for Older People is supported due to local need in Berkhamsted. DBC have granted a very recent planning permission for a high density retirement project on the immediately adjoining Hanbury’s allocation which demonstrates the strong demand in the immediate vicinity. As a consequence of this, we consider that the detailed words in the allocation of site BK03 should refer to the possibility of an element of housing for older people as an alternative option on part of the site. This will provide appropriate flexibility and ensure a smoother future planning application phase if such a use is ultimately found to be a favourable option for part of the proposal.

Policy DM 11 deals with the density of development and we agree with DBC on the flexibility provided by the following provision “Acceptable densities in Growth Areas will be guided by Masterplans and Design Codes to be informed by the

site specific allocations and the Dacorum Design Guidance” We do however have delivery timing concerns over the issue of Masterplans and design codes which we comment upon in our response to a later question.

Included files

Title Housing Delivery

ID EGS5285

Person ID 1264532

Full Name Robert Clarke

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
* Yes
* No

Officer Comment

Housing Delivery comment

Included files

Title Housing Delivery

ID EGS5322

Person ID 1264363

Full Name Roselyn King

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
* Yes
* No

Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS5331
Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS5362
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS5406
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS5428
Person ID	1264628
Full Name	sophie boden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>Again whilst I understand the logic behind this, surely consulting with people when you are not likely to get detailed responses due to the pandemic, seems illogical to me.</p> <p>You have referred to changes in use of housing in section 14.52. Is this something that you see being enacted here? Will you really be providing 30% affordable housing? Or if you can argue that there is less demand will you be selling sites to developers to develop and sell on, outpricing people settled here?</p>
Included files	
Title	Housing Delivery
ID	EGS5432
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>Affordable housing needs to be far greater than 35%. There are so many people in expensive rented accommodation who would prefer to be buying should they be able to afford to do so. I understand that people moving up the housing ladder do free up less expensive homes. However, with an economic downturn and all the uncertainty with Brexit and Covid I suspect less people will be able to afford to move and free up less expensive homes. Even the less expensive homes are unaffordable for many.</p> <p>The 'affordable' houses need to remain 'affordable' so when sold on they continue to be more 'affordable' than if they did not have a reduced price when new. For example there needs to be a covenant on the home; so it will always be sold at whatever the percentage reduction it was initially. Otherwise there will be no affordable homes for future generations (bit like the council houses that were sold off and a disproportionate amount are now privately rented out at a market rent).</p>

Houses and flats on the new estates should be no more than three floors. The houses should all have a reasonable size garden.

Included files

Title Housing Delivery

ID EGS5434

Person ID 1264636

Full Name Lynsey Bilsland

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment

Housing Delivery comment Depends on how you view affordable. The housing in Berkhamsted is incredibly expensive.

Included files

Title Housing Delivery

ID EGS5472

Person ID 1264647

Full Name Richard Burnell

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment	
Housing Delivery comment	Consider repurposing brownfield sites and make more efficient use of the current housing stock before developing greenfield sites.
Included files	
Title	Housing Delivery
ID	EGS5606
Person ID	1264679
Full Name	Paul Firth
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS5639
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	
Housing Delivery comment	DM10. Tring has the second highest level of density in the borough. The previous sections of the Plan do not clearly articulate the density relative to proposed development in Tring. It is therefore difficult to understand why Tring is to be subject of such a high level of development at a significant cost to the environment and the cultural and historical integrity of the Town and its neighbouring villages.
Included files	
Title	Housing Delivery
ID	EGS5645
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	
Housing Delivery comment	I do not agree that the houses proposed in the Berkhamsted and Northchurch green field areas are affordable or of sufficient quality or type. The last two developments along Shooters Way have been 3-4 bedroom detached and semi detached houses which are not built to high environmental standards, they are not well served by public transport and they are not affordable. New houses should be built to the highest environmental standards to be sustainable to reduce energy consumption, protect the environment, minimise risks of flooding and pollution. They should use sustainable materials that do not contribute directly to climate change such as large amounts of concrete which is proven to increase CO2 emissions significantly. The houses proposed in Berkhamsted and Tring are high density for a semi rural area and are not consistent with 4 c) highly accessible urban locations more likely to provide one and two bedroom properties. The benefits of building detached houses on green land in Berkhamsted and Tring will go to the developers in the form of high profit margins and not to the benefit of residents in Tring and Berkhamsted and their quality of life.
Included files	

Title	Housing Delivery
ID	EGS5694
Person ID	1264229
Full Name	Brian Dixon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Policy DM8. Would you please add against this Policy " To Town & Country Planning Statutory Instrument 2016 No.950". This is a mandatory requirement on the Dacorum Council
Included files	
Title	Housing Delivery
ID	EGS5703
Person ID	1263239
Full Name	Robert Farrer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	

Housing Delivery comment	The One Voice Alliance submissions reflect my views on all these guiding delivery policies.
Included files	
Title	Housing Delivery
ID	EGS5728
Person ID	1264678
Full Name	Tom A
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS5768
Person ID	1264460
Full Name	Jonathan Nicholls
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Officer Comment	
Housing Delivery comment	<p>I am not sure that this is the right page for this comment. 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 it's 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>
Included files	
Title	Housing Delivery
ID	EGS5825
Person ID	1264697
Full Name	Nicholas Wood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	

Housing Delivery comment

I utterly oppose your Housing delivery plans as they are based on flawed assumptions.

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. These EU workers will not be returning in anything like the numbers of the last decade as the Government revamps its immigration strategy. This alone will hugely decrease the demand for housing, indeed it can already be seen in falling rents in London.

In a second development, the home working revolution unleashed by Covid is decimating office rents as offices are not planning to require anything like the same number of in office workers as before. I know this to be true having just negotiated a huge rent decrease on my own company office! Old style commuter towns like Tring and Berkhamsted are not going to see anything like the need for houses designed for workers to commute into London that they have for the past decade, yet you continue to plan like it 2014!

Lastly as the physical offices fall vacant the struggles of physical retail, as evidenced by the collapse of Arcadia Group will lead to mass vacancy of town centre retail locations. Amazon is killing the shops, Netflix is killing the cinemas and Deliveroo is killing the restaurants. We are going to face many more town centre sites that will have no demand and will be available for re-development as housing, yet your have hardly mentioned brownfield housing sites preferring the much more developer profitable green belt ones for your housing.

I cannot support the destruction of so much gree belt\$ land for housing when your assumptions of future housing need are so broken

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. You have to revisit your assumptions urgently in the light of our massively changed society.

Included files	
Title	Housing Delivery
ID	EGS5841
Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Officer Comment	
Housing Delivery comment	The aim of the policy is to ensure sustainable and affordable housing. I fear that Tring will suffer from the same affliction as the current Roman Park development - the majority of houses being large and expensive. The types of property should be in keeping and not detract from the character of the town, which is something that large developments do not have a history of doing.
Included files	
Title	Housing Delivery
ID	EGS5858
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>Looking at my own locality, a 24% increase (more than 900 houses) in housing proposed in Berkhamsted is unsustainable and is more than this small market town can tolerate.</p> <p>As mentioned previously the Council is using outdated (2014) ONS housing projections. The most recent ONS Data (2018) suggests only half of this is needed.</p> <p>I have read on social media accounts from my local councillors that DBC is well aware of the shortcomings in the Local Plan but has decided not to challenge, rework or amend the timetable. Very disappointing that DBC is not representing its residents.</p>
Included files	
Title	Housing Delivery
ID	EGS6032

Person ID	1264797
Full Name	Robert Diehl
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I question how realistic it is for developers to offer a minimum of 35% affordable homes on larger development around Berkhamsted. I fear this target will not be achieved.
Included files	
Title	Housing Delivery
ID	EGS6034
Person ID	1264822
Full Name	JULES GARNER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	1 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. Affordable housing therefore needs to be more accurately defined in the
Included files	

Title	Housing Delivery
ID	EGS6038
Person ID	1264824
Full Name	Anne Pattinson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	More housing may well be needed, but to increase the size of a town (Tring), especially a relatively small one, by 50% over 18 years is madness. It will entirely alter the fabric of the town and it will no longer be the small, welcoming and quiet place that it currently is. Other areas seem to be increasing by around 20%...
Included files	

Title	Housing Delivery
ID	EGS6078
Person ID	1264847
Full Name	Cheryl Newcomb
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	

Housing Delivery comment	A minimum of 35% affordable housing does not seem sufficient given house prices in the borough are well above the average.
Included files	
Title	Housing Delivery
ID	EGS6089
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Families need safe gardens not just general outside space, this should be a requirement. They also need parking for the family car and possible a work car or van.
Included files	
Title	Housing Delivery
ID	EGS6092
Person ID	1264816
Full Name	Christopher Nicholls
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS6189
Person ID	1264872
Full Name	Ben Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS6218
Person ID	1261819
Full Name	Alex Rathmell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	As outlined in previous responses
Included files	
Title	Housing Delivery
ID	EGS6238
Person ID	1264030
Full Name	Sean Collier
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I agree that affordable housing should be developed, as there is a lack in the area, but it is unclear as to how affordable this housing would be considering Dacorum is in an area with higher cost of living. Will this be social housing? If I have read correctly, I also believe more than 10% of the housing developments should be affordable. I agree with point 14.11, a 30% discount to get young people on the property ladder.
Included files	
Title	Housing Delivery
ID	EGS6244
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS6251
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	
Housing Delivery comment	A target of 40% affordable housing, while laudable, seems impractical in Tring and Berkhamsted.
Included files	
Title	Housing Delivery
ID	EGS6254
Person ID	1263462
Full Name	Bourne End

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Out of date algorithms are a poor basis for targets for housing need and indefensible in terms of policy, Developers will cherry pick the sites on their own criteria not local need,
Included files	
Title	Housing Delivery
ID	EGS6295
Person ID	1264884
Full Name	Max Ansell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Dacorum needs to revise its growth plans rather than compromise Green Belt land and build more houses than are needed in an area where even 'affordable housing' in this region is beyond the pocket of those in need.
Included files	
Title	Housing Delivery
ID	EGS6376

Person ID	1262933
Full Name	James Cunningham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Have we given up in local authority housiung for those with low incomcs. "affordable housing" is a misnoma!
Included files	
Title	Housing Delivery
ID	EGS6462
Person ID	1264936
Full Name	Jane Cracknell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery

ID	EGS6501
Person ID	1145686
Full Name	Mrs Sarah Gray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Shouldd be going for some smaller sites of social housing which are kept permantly in public ownership. Building in Berkhamsted is what the developers like as the town has a premium for houses, they make more for the same size house!
Included files	
Title	Housing Delivery
ID	EGS6525
Person ID	1227391
Full Name	mrs caroline shaughnessy
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	

Housing Delivery comment	Same comment regarding residential properties and parking allocation as in comment at 4
Included files	
Title	Housing Delivery
ID	EGS6538
Person ID	1264731
Full Name	Graham Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Paragraph 14.14 I cannot see by this is a requirement for larger sites. Even moderate sized sites (10+) should have such a requirement. To free up larger homes many older people would like smaller bungalows with a garden - not flats.
Included files	
Title	Housing Delivery
ID	EGS6564
Person ID	1264441
Full Name	David Taylor
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	
Housing Delivery comment	<p>I believe the Local Housing Plan is flawed. The number of properties planned for Berkhamsted and Bovingdon will overload local facilities.</p> <p>I call upon Dacorum Borough Council to:</p> <ul style="list-style-type: none"> - Redraw the plan based on the recent housing densities achieved - Revise housing targets so that they are based on up to date assessments
Included files	
Title	Housing Delivery
ID	EGS6571
Person ID	1264923
Full Name	Ken Douglas
Organisation Details	Secretary TRING IN TRANSITION
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ PWCG
Housing Delivery comment	<p>Policy DM2 ‘Affordable Housing’, section 14.24</p> <p>The last bullet point states ‘<i>resisting the subdivision of sites to avoid on-site contributions</i>’. Why not just say that it is "<i>prohibited</i>’?</p> <p>Policy DM8 ‘Custom and Self Build Housing’, (Page 70)</p> <p>If you were to look at this from first principles - the council would do all it can to encourage self-build. If this is on council owned land (e.g. Tr01) then you can get round the CIL restriction simply by charging more for the land. A group already exists in Tring (contact via Tring in Transition) to make this work financially and practically. It could be a HUGE example</p>

for DBC to pull this off.....so why not change the overall proportion of self-build to approach at least 5% in total by the end of the Plan's timeframe?

It feels like DBCs approach has been defensive throughout this planning process....but there are many bodies out there would help if give the opportunity.

- The last bullet point states '*resisting the subdivision of sites to avoid on-site contributions*'. We strongly recommend that this very weak, albeit well-intentioned, statement be re- worded to '*the subdivision of sites to avoid on-site contributions is prohibited*'

Without being far stronger on this issue, there is serious risk of a massive hole being blown in aspirations regarding provision of affordable homes. This point needs to be incorporated into policy DM2.

Policy DM8 'Custom and Self Build Housing', (Page 70)

- We strongly encourage self-build, as a catalyst to encourage the delivery of truly affordable homes and/or homes built to high environmental standards. A target of circa 70 homes out of a total of 16,000 is, however, quite inadequate, being less than 0.5%. Demand would increase significantly if this were an easier option. We would like to see the overall proportion of self-build to approach at least 5% in total by the end of the Plan's timeframe

Included files	
Title	Housing Delivery
ID	EGS6583
Person ID	1263380
Full Name	Martin Warden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The housing density, types of dwellings and variations for special needs, including attractive down sizing options to release larger houses occupied by one or two older people who may struggle to maintain their property but do not wish to move out of their home area.

None of these will be properly provided so long as new housing is squeezed into the edges or restricted areas of Tring and Berkhamsted.

Included files

Title Housing Delivery

ID EGS6586

Person ID 1265007

Full Name Duncan Brown

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment

Housing Delivery comment I support the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted (especially when seeing the detail that explains what 'Affordable Housing' actually means), which makes the Council's strategy even more questionable.

Included files

Title Housing Delivery

ID EGS6668

Person ID 494770

Full Name Mr John Borton

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes	
* No	
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS6692
Person ID	1265019
Full Name	Yvonne Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I endorse the response of the chiltern countryside group
Included files	
Title	Housing Delivery
ID	EGS6714
Person ID	1264920
Full Name	Anna Wellings Purvis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS6773
Person ID	1265036
Full Name	Tom Burrows
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Do not underprice homes built! Maintain the price of local area.
Included files	
Title	Housing Delivery
ID	EGS6789
Person ID	1263500
Full Name	Jessica Haigh
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS6865
Person ID	1264867
Full Name	Corinne Fleming
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	<p>The proposed strategy for Tring would clearly detract from the town's character as it will increase the town's population by over 50% in less than 20 years - over development on a huge scale. It will not minimise the development of the green belt as it represents a major reduction of the green belt land around the town and it would also have a detrimental impact on the Chilterns AONB. It therefore represents a complete disregard for the existing character of the town and the landscape.</p> <p>It is not acceptable to increase a town to this extent. It would make more sense to increase the number of additional homes in Hemel Hempstead where an increase would have smaller effect on a larger town. The council could also choose to develop housing on land around the industrial estate or redevelop under used office space so that less prime agricultural land is sacrificed and so that development would have no impact on the AONB.</p>

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.

Included files

Title Housing Delivery

ID EGS6889

Person ID 1265059

Full Name Paul Austin

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Officer Comment

Housing Delivery comment

Included files

Title Housing Delivery

ID EGS6904

Person ID 1265081

Full Name Caitlin Neale

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I support the intention to have 40% of new homes on sites of 10 or more homes as affordable. I would encourage you to push higher than that. What isn't covered is what the penalty is for those building organisations that don't deliver affordable houses as committed to on the delivery of contracts. We know from many developments across the country that commitments are made and then not adhered to.
Included files	
Title	Housing Delivery
ID	EGS6949
Person ID	1265058
Full Name	Rick Ansell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The need for local new housing is not clear. It is much more likely that new housing in Dacorum will be taken up by people moving out of London and into the area. Changing the character of local towns and making them into London satellite towns rather than, in the case of Berkhamsted a traditional Market Town.
Included files	
Title	Housing Delivery
ID	EGS6959
Person ID	1265105

Full Name	Jonathan Tay
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS7002
Person ID	1265116
Full Name	andrew Koutsou
Organisation Details	Me - resident
Agent ID	1265101
Agent Name	andrew koutsou
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	too many house propped in tring. Identity of town lost. Too much beaucratic red tape on this form to get any real response from residents.
Included files	
Title	Housing Delivery

ID	EGS7028
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Whilst recognising that this is a very complex issue, I will highlight just one point and that is that I simply do not believe that affordable homes are affordable. The formula for deciding what is affordable is flawed. As an ex-teacher in Hemel Hempstead I know that many of the pupils that I taught had to leave Hemel and move north because they had jobs whose pay was insufficient to allow them to buy a property or even rent a property in Hemel.
Included files	
Title	Housing Delivery
ID	EGS7033
Person ID	1262718
Full Name	Clare Norton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	

Housing Delivery comment	I strongly support the development of mixed tenure residential developments to enable social cohesion and to enable all households to be well housed. The housing need in the local area is such that a mix of affordable homes and those for market sale is needed. As a housing professional working with single homeless people I see every day the difficult lives of people who become homeless and have no recourse to statutory support. Increasing housing supply will relieve pressure on the wider housing market and will lead to more affordable accommodation, and this will benefit all elements of society.
Included files	
Title	Housing Delivery
ID	EGS7047
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Too late to elaborate.
Included files	
Title	Housing Delivery
ID	EGS7099
Person ID	1262099
Full Name	Chris Taylor
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Officer Comment	
Housing Delivery comment	It's admirable that the council's intention is to have 40% of new homes on sites of 10 or more homes as Affordable, including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS7117
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate.
Included files	
Title	Housing Delivery
ID	EGS7137
Person ID	1265129
Full Name	Karen Foxwell-Moss
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The council's intention to have 40% of new homes on sites of 10 or more homes as 'affordable', including homes to rent, is laudable. However, it is doubtful that this can be achieved for developments around Berkhamsted.
Included files	
Title	Housing Delivery
ID	EGS7140
Person ID	1265146
Full Name	David Gibson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	I object to these proposals on the basis that the number of houses is too high and many of the sites are on the greenbelt. I believe these proposals would do long term environmental damage.
Included files	
Title	Housing Delivery
ID	EGS7197
Person ID	1261685

Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Affordable housing opportunities will come about from re-purposing offices and retail premises. The world is changing!
Included files	
Title	Housing Delivery
ID	EGS7201
Person ID	1265166
Full Name	Nigel Purkis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	The proposed scale of development in Tring is disproportionate and damaging to the environment. I endorse the comments previously submitted by Tring in Transition and by the Tring Labour Party.
Included files	
Title	Housing Delivery
ID	EGS7235

Person ID	1264956
Full Name	Caroline Heard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS7306
Person ID	358532
Full Name	Ms Gillian Culham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<u>OBJ - URBD</u>
Housing Delivery comment	P60 Policy DM1 NO ONE BEDROOM PROPERTIES. Not just in Dacorum but in the whole of the country

P67 Policy DM12

Space standards are shrinking when they should be expanding. Needs to return to at least the 1930s.

P76

Extremely poor space conditions

P60

Again two bedrooms as normal, give people time to settle and not have to worry about having to keep moving and the cost it involves. A settled community, NO more one bedroomed living/existing, and a balcony of some description is a must, if a garden space is not available. Gardens could also be incorporated into the designs of flats with innovative thought, structures (one garden to each flat) get your thinking caps on (on each level) not just on the ground!!

Included files

Title Housing Delivery

ID EGS7328

Person ID 864107

Full Name Mr Antony Hetherington

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Officer Comment OBJ HOUS

Housing Delivery 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 Housing Delivery

ID EGS7339

Person ID 1207259

Full Name Mr Graham Bright

Organisation Details Chairman
Grove Fields Resident Association

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Officer Comment OBJ HOUS

Housing Delivery 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 Housing Delivery

ID EGS7492

Person ID 1265558

Full Name	CLAIRE AND GORDON HEWITT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO INFR BER TRI
Housing Delivery comment	<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.</p> <p>This proposal needs revisiting in order to get the support of the local community.</p>
Included files	
Title	Housing Delivery
ID	EGS7511
Person ID	1265572
Full Name	DAN STOBBS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	1 OBJ – GRO – HOUS – GRBT - INFR

**Housing Delivery
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 Housing Delivery

ID EGS7523

Person ID 1265578

Full Name SINEAD BERNHAUSER

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Officer Comment OBJ – URBD BAGI HECH OSSL

Housing Delivery comment I had problems logging into the portal.
 I want to have my comment included please;

 Please do not allow any buildings over 4 stories in Boxmoor.

 I believe the environmental, historical, cultural, educational Moors area should be retained and protected for the Dacorum people, children and communities to come in the future.

Included files

Title Housing Delivery

ID EGS7535

Person ID 1146073

Full Name	Mrs Emma Kingham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	1 OBJ – HOUS - GRBT – KL02
Housing Delivery comment	<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& 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>

Included files	
Title	Housing Delivery
ID	EGS7572
Person ID	1265607
Full Name	Victoria Hayes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – GRO – HOUS – AHST – FRAD - TRI
Housing Delivery comment	<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>

Included files	
Title	Housing Delivery
ID	EGS7606
Person ID	1143218
Full Name	Mr Terry Cartmell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS7620
Person ID	1207710
Full Name	Penny Bennetts
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS EMPL RETL AHST BAGI
Housing Delivery comment	<p>It would be helpful to have more affordable housing but how will the council ensure that the developers do not default on this as they do?</p> <p>I think the council should reconsider the employment and retail aspects following the impact of Covid on business.</p> <p>I support, with reservations, the climate change, environmental and biodiversity, delivering great places, sustainable transport and connectivity and healthy communities statements. I hope to see real development and innovation in the new homes while there is the opportunity. Attitudes must change to build the best we can for the future.</p>
Included files	
Title	Housing Delivery
ID	EGS7631
Person ID	1265747
Full Name	STEPHANIE BRADLEY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ - HOUS - LAND - BAGI - GRBT - COU - COVID
Housing Delivery comment	<p>I would like to make the following points:</p> <p>To hold such a detailed plan consultation in the midst of a worldwide pandemic is questionable. People are far more focused on other issues crucial to their survival and have been over the past year. This is borne out by the tiny number of responses you have received.</p>

The plan was presented in a way that was not user friendly, salient points were not easily picked out, even by those who are highly educated, let alone those are not. This type of plan should be presented in a clear and concise but fully explicit manner such as an exhibition, with displays that are accessible to all (clearly not possible in a pandemic), for all areas of Dacorum.

The response portal is not at all user friendly and has put many people off responding.

The plan and consultation was not widely advertised and only after much petitioning about this point was literature sent to every household. The literature sent was wholly inadequate and set to mislead about some of the most important (and controversial) posts in the plan.

The pandemic has resulted in massive changes in lifestyle and these are not reflected in the plan, therefore it should be revised in light of these major changes to how we live and work.

It makes no sense to use the 2014 ONS figures with the incorrect algorithm when more realistic projected numbers can be based on the more recent 2018 projections. Using the 2014 figures does not provide an “objectively assessed need”. Consequently the numbers projected are far too high.

Villages will cease to be self-sustaining and become car-linked hubs to the main towns.

Social housing needs for the area will not be met by this plan.

The projected use of greenbelt land should not be pursued and the greenbelt should be protected. Alternative locations must be sourced as a priority and the greenbelt protected.

There is no mention of the Glover report which proposes that the AoNB becomes a National Park. This plan goes against this report.

Climate Change considerations are key. The plan does not address how house building and subsequent use, transport and infrastructure will align with the Government 2025 net zero target. The carbon cost of using greenbelt land is key.

Many of the documents referenced are in draft form and not up to date., including the habitats assessment (2006). There are no Habitats Regulations Assessment Documents .

Biodiversity value change assessments should be included and verified independently.

Most of the developments will be taken by commuters rather than locals as not affordable for locals. Priority and affordability for locals should be key.

Inadequate transport and infrastructure: Provision must be made for sustainable transport from existing and new developments. Most of the new developments are out of town and the car cannot be prioritised for travel to stations (most of these developments will be for commuters and few locals). Bicycle travel must be prioritised. I am too scared to cycle on the roads. My husband has had 3 serious accidents (broken collarbones twice) due to potholes.

The people of Dacorum must have this plan explained to them so that they can understand the full impact of the plan proposals and hopefully realise that it is highly detrimental to future generations and can challenge it accordingly. Having spoken to them, almost all of my friends have no real idea about any of it and the seriousness of it.

The points above should be addressed and the plan put out for consultation in a correct manner once the world returns to some sense of normal... our future depends on it.

Included files	
Title	Housing Delivery
ID	EGS7638
Person ID	1265748
Full Name	Mr Roger McVey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS7652
Person ID	1265752
Full Name	Mrs Flora Moores
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery

ID	EGS7671
Person ID	1261784
Full Name	Nigel Vanner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS7697
Person ID	1265614
Full Name	JACKIE BARKER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS7711
Person ID	1265765
Full Name	Miss Inma Rodriguez
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery

ID	EGS7750
Person ID	1265780
Full Name	James McDonald
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS – AHST – INFR – ENVH – KL02
Housing Delivery comment	<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>

Included files	
Title	Housing Delivery
ID	EGS7799
Person ID	1148738
Full Name	Ian and Claire Field
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – BER TRI BOV
Housing Delivery comment	(14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, Tring, Bovingdon and surrounding areas which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS7832
Person ID	1265915
Full Name	Mr Stephen Trueman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Officer Comment	OBJ GRO The proposed Policy DM5, in providing the principle of conversion of houses to flats and non-residential properties to housing
Housing Delivery 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	Housing Delivery
ID	EGS7869
Person ID	1265975
Full Name	Clare Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS
Housing Delivery comment	(14) Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS7909

Person ID	1265991
Full Name	NICHOLAS MORGAN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<p>— 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.</p> <p>— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.</p> <p>— 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.</p> <p>— 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.</p>
Included files	
Title	Housing Delivery
ID	EGS7926
Person ID	1262335
Full Name	Penelope Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Officer Comment	OBJ HOUS
Housing Delivery comment	<ul style="list-style-type: none"> • 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
Included files	
Title	Housing Delivery
ID	EGS7992
Person ID	1266015
Full Name	SOPHIE WHITTON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ – HOUS AHST BER COVID EMPL RETL
Housing Delivery comment	<p>b) 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>c) 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>d) 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>
Included files	
Title	Housing Delivery
ID	EGS8084
Person ID	1266049

Full Name	Mike Plowman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV - HOUS
Housing Delivery comment	Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS8100
Person ID	1266058
Full Name	Charlotte Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV HOUS
Housing Delivery comment	2) As a wheelchair user I am constantly facing challenges, although these have improved in the last few years. 1 in 5 members of the population are disabled in some way. This will have increased following the pandemic and legislation now states that we have to be catered for. This means adaptations in a variety of ways within accommodation and in municipal areas. Local facilities for exercise, care and occupation are also essential for this significant group and these factors will need to be written into any plans.

Included files	
Title	Housing Delivery
ID	EGS8132
Person ID	1145701
Full Name	Mrs Thelma Gillen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ HOUS
Housing Delivery comment	1 I understand the government is intending to change the algorithm that determines the required level of house building to reduce the burden on the south-east. It seems perverse to be setting out local plans based on soon-to-be-replaced algorithms. Surely consultation should be deferred until the new algorithms are in place?
Included files	
Title	Housing Delivery
ID	EGS8189
Person ID	1207825
Full Name	Claire Hobson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Officer Comment	OBJ – GRO – HOU – URBD – GRBT – HGC – COVID – HH08 – HH12
Housing Delivery comment	<p>I am responding to the consultation on behalf of myself and the X adults who live with me.</p> <p>I gave up trying to use the portal as it was impossible to work through all the documentation to answer the questions - why wasn't a simple questionnaire set up, separate from the documentation? This is one of the worst examples of a system set up for the benefit of the people receiving and collating responses rather than making it easy for citizens to reply. This is an unacceptable barrier to responding.</p> <p>I have lived in Boxmoor for over 23 years, I went to senior school in Warners End and until the pandemic commuted to London daily. I brought up my family here and have loved being close to the town centre, the canal and plenty of green space that sets Hemel aside from many post war developments.</p> <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 on a screen, even for me an IT literate person who has a professional office set up at home, with a large screen/keyboard/mouse etc. For those who only have a tablet or phone it is impossible to engage in any meaningful way with the consultation. I apologise in advance for any typos - I am exhausted from all the extra work I have had to do in the pandemic due to public services being closed for a year and more people in the house and community to look after.</p> <p>I am educated to MSc level, a 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.</p> <p>I urge councillors and officers to take a step back and put themselves in the shoes of residents when designing huge and life-changing consultations. This has not put the council in a good light. Some local councillors have taken to social media to publicise the consultation but there was very little from the council. This consultation should have been postponed or extended to beyond lockdowns and school closures to enable a full and open review and engagement with the whole community.</p> <p>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.</p> <p><u>Greenfield/greenbelt</u></p> <p>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.</p> <p><u>Housing requirement and council tactics (Q1)</u></p> <p>Too many houses, too few affordable homes.</p>

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	Housing Delivery
ID	EGS8221
Person ID	1266154
Full Name	Iain Smith
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP – HOUS
Housing Delivery comment	(14): Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS8263
Person ID	1266159
Full Name	Carol Hart
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS – AHST – GRBT – TRDS
Housing Delivery comment	<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</p>

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.

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.

Included files**Title** Housing Delivery**ID** EGS8270**Person ID** 1266165**Full Name** Nicky Kaleniuk**Organisation Details****Agent ID****Agent Name****Agent Organisation****Yes / No**

* Yes

* No

Officer Comment OBJ - HOUS - URBD - AHST - INFR - HH08 - HH12**Housing Delivery comment**

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.

The local plans for the area, and of boxmoor do nothing to alleviate my worries about this, and fills me with dread!

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.

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.

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.

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.

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.

Please consider residents views and stop the overdevelopment of this wonderful area.

Included files

Title Housing Delivery

ID EGS8286

Person ID 1266170

Full Name Philip Hill

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBJ – GRO – HOUS – INFR – GRBT

Housing Delivery 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** Housing Delivery**ID** EGS8292**Person ID** 1266171**Full Name** Patrick and Gillian Wilks**Organisation Details****Agent ID****Agent Name****Agent Organisation****Yes / No**

* Yes

* No

Officer Comment OBJ - HOUS - AHST - LAND - GRBT**Housing Delivery 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 Housing Delivery

ID EGS8297

Person ID 1266172

Full Name Mr and Mrs P.C Pegrum

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBJ – HOUS – GRBT – TRDS - COVID -

SUP CCG

Housing Delivery comment

We have lived in Tring for 40 years and have seen a lot of residential building projects taking place during this time and understand that all towns must support growth and development in an appropriate way. We cannot see how increasing a small market town like Tring by 55% (2,731 houses are planned) is a balanced proposal.

We only received the brochure for us to review a couple of weeks ago and this is not sufficient time for anyone to really research and reply to this proposal, but we felt that we must say something. Some of our neighbours did not receive a copy of the brochure and so we are concerned that this omission may have occurred elsewhere denying a full and satisfactory number of comments being received to judge what is right for the residents in the surrounding villages/towns.

Also because of the Covid-19 situation, we have been unable to attempt to meet with other concerned local people and have a consultation with yourselves face to face as indeed we have done in the past (Tring relocation of local dump site and also when there were concerns about increase in flights from/to Luton London Airport) and to register our concerns/opinions. We have not been able to meet with residents in the High Street and distribute leaflets about the proposal to ensure that most residents are aware of what is happening.

These are just a couple of concerns that my family has.

However of most concern is the planned erosion of the Green Belt in the Borough and AONB. Surely the Council should be seeking other more suitable areas to build upon before developing homes on Green Belt - the definition of which I state from the Government's document Paragraph 133 which says "the Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land PERMANENTLY OPEN; the essential characteristics of GREEN BELTS are their openness and their PERMANENCE". Clearly that means that the DBC are working in complete contradiction to the Government's National Planning Policy Framework specifically in the protection and unnecessary development of GREEN BELT land. Surely this is something that the Council Members must need to address before someone decides to pursue this within a legal framework as environmental groups have done with regards to HS2 and how much money would be wasted with court appeals and legal costs yet achieving nothing for everyone concerned.

Surely it would be worthwhile for a postponement of any planning considerations at the moment (Covid-19 lockdown restrictions) until the parties concerned (various local concerned groups, etc.) can meet and liaise with the DBC planning council and hold a meeting that can be positive for all parties involved.

My family have read the recent Response by the Chiltern Countryside Group and fully support the broader points made by them.

Included files

Title Housing Delivery

ID EGS8301

Person ID 1266173

Full Name	Kate Nolan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS - AHST – BER – BK06
Housing Delivery comment	<p>SAVE ONE TREE HILL, NORTHCHURCH</p> <p>One Tree Hill is the name that my family and I have used for the proposed development site in Northchurch (or 'West Berkhamsted' as it is referred to in the planning document) for the 40 years that I have lived here. My children love the fields as much as I do and we enjoy looking out at them and watching how they change throughout the year.</p> <p>I would like to lodge my objection to the proposed plans to build on this land.</p> <p>I believe that these proposed developments in Northchurch, as well as obliterating our precious green spaces, which are so important to all of us for our mental and physical wellbeing, will also put extraordinary pressure on the local environment and residents in terms of traffic congestion and access to local services.</p> <p>Northchurch is loved by all of us who live here for its beautiful views, its calm and quiet pace and its village feel and identity. I believe that these plans will 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>
Included files	
Title	Housing Delivery
ID	EGS8328
Person ID	1266176

Full Name	Francesca Ryde
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS - AHST - INFR - FRAD - TRI
Housing Delivery comment	<p>I write to you regarding the Proposed Development in Long Marston for over 3,000 houses.</p> <p>Have you thought about the local infrastructure? The small country lanes already smothered in pot-holes, large vehicles ruining verges, encroaching on the ditches (to MINIMISE FLOODING), destroying wildlife? What about the farms already there, for hundreds of years, actually sitting on FLOOD PLAINS? What about the schools, the doctors surgery's, the already at capacity local hospitals and tiny train stations barely able to meet current capacity? The list could go on, but I am aware we are VERY SHORT OF TIME.</p> <p>Quite frankly this is ridiculous and has not been diligently thought through. As for the timeframe of LESS THAN A WEEK for objections to be raised and informing the landowners; it is an utter disgrace. You may have pressures from higher powers but seriously, have you not thought beyond that? You clearly have no heart for the people you are supposed to look over. Livelihoods will be lost, generations of farming destroyed, wildlife killed, local workforce's crippled, current locals needs disregarded, all for you to 'meet targets'. Good luck when the rain comes is all I can add. We live on clay!</p> <p>I urge you to reconsider your planning and your ultimatum timeframe. Have a heart.</p>
Included files	
Title	Housing Delivery
ID	EGS8400
Person ID	1266230
Full Name	CAROLINE WHELAN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	OBJ HH12 OSSL
Housing Delivery comment	I wouldn't normally get involved however I believe we now need to I work for Hemel Hempstead hospital I also live in Boxmoor unfortunately we also had to have new houses built at bottom of our garden taking away much of the light in winter nights however during COVID lockdown I have never seen so many families and a lot more elderly people all walks of life use the moor .My neighbours are mostly elderly sit in there gardens as the cannot walk far or in wheelchairs will now have to sit looking at monstrosity buildings going up everywhere as it won't stop there once planning is permitted in the summer we have the animals in there children come from everywhere the even play in the stream everyone comments on how beautiful Boxmoor is and now you want to ruin the whole area I don't understand why anyone in there right mind would agree to this Boxmoor is not a working area apart from small businesses there is plenty of buildings available on industrial estate build them up there leave us alone please
Included files	
Title	Housing Delivery
ID	EGS8446
Person ID	1266276
Full Name	BARBARA ANSCOMBE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS
Housing Delivery 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 Housing Delivery

ID EGS8468

Person ID 495878

Full Name Ms Anna Hanson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBJ

Housing Delivery comment

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.

Included files

Title Housing Delivery

ID EGS8480

Person ID 1266302

Full Name Gareth Garner

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Officer Comment	OBSV – HOUS PWCG
Housing Delivery comment	1 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. Affordable housing therefore needs to be more accurately defined in the plan
Included files	
Title	Housing Delivery
ID	EGS8495
Person ID	1266311
Full Name	Dr Gwynneth Down
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS8574

Person ID	1266567
Full Name	CAROLINE SMALES
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ - HOUS
Housing Delivery comment	Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS8628
Person ID	1266604
Full Name	SEB BELOE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ – HOUS AHST BER COVID EMPL RETL
Housing Delivery comment	— 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, missing a once in a generation opportunity for change.

Included files

Title

Housing Delivery

ID

EGS8657

Person ID

1248896

Full Name

Ashleigh Genco

Organisation Details

Harrow Estates plc

Agent ID

1258542

Agent Name

Samantha
Ryan

Agent Organisation

Yes / No

Yes

* Yes

* No

Officer Comment

OBJ HOUS

Housing Delivery comment

In accordance with national planning policy in the Framework the Growth Plan focuses on identifying priorities for the development and use of land in Dacorum – this is supported by Harrow. The Guiding Development policies of the draft plan are non-strategic and generally provide guidance on matters of design, conservation of the natural and historic environment and other development management issues including affordable housing, landscape and standards for development. Harrow agrees that the range of policies is generally consistent with national policy and welcome the fact that they are ‘guiding’ and not ‘prescriptive’. It is important that policies do provide an element of flexibility enabling proposals to be determined according to the specific site and merits of the development or where viability is likely to be a consideration. The following policies are highlighted as being of particular relevance to the proposed growth areas, including land east of Tring (Tr03):

Policy DM1 – Mix of Housing: Harrow acknowledges the housing mix which is derived from the Local Housing Needs Assessment. While broadly representing the current housing need across Dacorum, the mix of housing will differ across

the different spatial areas and is likely to change over time. It is important, therefore, that the mix is indicative and not a target requirement to be met on individual development sites.

Policy DM2 – Affordable Housing: Harrow fully recognises and supports the requirement to deliver affordable housing in growth areas. The company does not object, in principle, to the target requirement of 40% in those areas, nor the need for those homes to be ‘genuinely affordable’. However, Harrow is concerned that the policy calls for affordable homes to be ‘substantially below the market price’ which may impact on the ability to provide the full quantum of affordable housing units, particularly in growth locations where significant infrastructure and other contributions are also required. Harrow welcomes the fact that the policy acknowledges the need to consider overall viability of the scheme and any abnormal cost, while reserving its position to comment further on this draft policy once the viability appraisal and an explanation of how the affordable housing requirement will be calculated has been made available.

Policy DM8 – Self and Custom-build Housing : While supporting opportunities for this type of housing, Harrow does not agree that the policy should set a target of 5% on large sites. This policy target is not supported by evidence of demand and may adversely impact on viability, particularly on sites with a high affordable housing requirement and infrastructure costs.

DM11 – Housing Density: Harrow agrees that the density of housing development in the growth areas should be guided by Masterplans for those sites. The illustrative masterplan accompanying Harrow’s representations shows that the provision of open space and infrastructure, required by other policies, will significantly reduce the amount of land available for housing development in those areas.

Policy DM12 – Space Standards: This policy is unnecessary since it simply sets out a requirement for development to comply with national space standards.

Included files	
Title	Housing Delivery
ID	EGS8669
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	

Officer Comment	PWCG OBSV - PWCG - AHST -
Housing Delivery comment	<p>Adult Care Services</p> <p>The provision of appropriate housing for both older people and people with disabilities is critical, which is underpinned by the National Planning Policy Framework (NPPF). This is also reflected in the Local Planning Authority’s (LPA’s) Housing: Policy Background Topic Paper, ‘offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems’. Furthermore ‘The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent An ageing population will see the numbers of disabled people continuing to increase and it is important we plan early to meet their needs throughout their lifetime.’”</p> <p>The older population of Dacorum (over 65s) is predicted to increase by 37% by 2040 (POPPI data, accessed December 2020). Of these, 4,252 people aged between 65 and 74, and 8,239 people aged over 75 will be living alone. Projections also show an increase of 53% of people living in a residential care home with or without nursing care during the same period. Research shows that social isolation and inappropriate housing are key determinants of poor health outcomes in all people, but especially for those who have disabilities or over 65. Extra care housing, specifically designed to improve health and social connection and built in areas that strengthen local communities and place shaping activities, can help alleviate stress on public services, allow local communities to remain intergenerational, and can help release under-occupied housing back into the general market helping to balance housing need across the</p> <p>The county council’s Adult Care Service (ACS) has developed a local set of design standards to ensure there is a good, consistent extra care offer in the A minimum of 50 units, up to 130 units as a maximum for each scheme is considered optimum, with guidelines and features of minimum site and height sizes for each scheme included. The table below shows approximate dimensions as a guide, although each scheme should be assessed on a site by site basis. These ACS design principles have been shaped by national standards, good practice and excellent schemes in other areas. The Council does not own any of the existing extra care schemes in Hertfordshire, so collaboration and partnership working with our housing associations and districts will be required, and will include residents and the local community, in line with co-production principles.</p> <p>Hertfordshire’s set of design standards aims to support the delivery of specialist housing options for older The guide has been developed for architects, developers and housing providers delivering homes including homes for private sale and a range of affordable housing tenures. By meeting the standards in the guide, new homes for older people in Hertfordshire are expected to achieve excellence in quality and desirability.</p> <p>Policy DM5: Conversions and changes of use to housing</p> <p><u>Transport</u>. With regard to paragraph d) of this policy, it should be noted that many of the conversions from office to residential either fail to utilise sustainable connections or are impacted significantly by HGV movements casing severance to vulnerable road users. Existing access arrangements are also often oversized for the converted residential use and</p>

could be improved/reduced in scale to support a safe and efficient pedestrian network. Mitigation of this should be included within this policy.

Policy DM7: Houses in Multiple Occupancy

Transport. Consideration of space for cycle parking suitable for all residents should be included in this policy as follows:

Proposals to create or extend Houses in Multiple Occupation will be supported where they would:

- 1 *not create an over-concentration of such accommodation in the local area;*
- 2 *not cause harm to residential amenity or the surrounding area;*
- 3 *not lead to any other significant adverse effects; and*

ensure parking is well landscaped, retaining established trees and shrubs to minimise the dominance of car parking to the frontage / street scene; and 5. cycle parking for all residents should be included in new developments.

Existing Accommodation for Travelling Communities

The county council currently operates the gypsy and traveller site at Three Cherry Trees Lane in Hemel Hempstead. This site does not meet the current design standards for a gypsy and traveller site within the county and the number of pitches within it are significantly higher than is considered now to be good

It is therefore suggested that the LPA reviews the opportunity to provide additional pitches on proposed new sites within the emerging draft local plan, as well as the addition of potential alternative sites to allow for the re-provision of the Three Cherry Trees Lane This might then allow this site to be made available for alternative development.

Residential Moorings

Transport. The county council will not support any moorings that would have a negative impact on the use of waterways for

Neighbourhood centres and scattered local shops

Transport. Local shops and scattered neighbourhood centres provide obvious destinations for short local trips that could be achieved by walking and cycling. These routes should be protected and enhanced where possible, and suitable high-quality cycle parking provided where possible.

Included files	
Title	Housing Delivery
ID	EGS8690
Person ID	1266699
Full Name	Ms Carleen Bircham
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ - GRO - HOUS - INFR - AOC
Housing Delivery comment	<p>I am writing in relation to the massive development of Dacorum housing currently in consultation, which I - and most people I have recently spoken to - have only just heard about, and which is only in consultation until this coming Sunday. I was unaware of the booklet that was supposed to come through residents doors.</p> <p>Whilst I support the need to increase housing, this needs to be done in a sustainable way and to preserve the greenbelt. The plans to increase housing in the area by 16,600 new homes is completely excessive to what the projected need is. The latest ONS data available projects 6051 new homes by 2038 - 64% fewer than this plan projects. I therefore object to the proposed plans and would like this email put forward to the decisions board.</p> <p>There is already a high demand for services such as traffic needs, schools and healthcare in the Dacorum area. The plan does not commit to any level of sustainability in its sustainability targets.</p> <p>A booklet through some doors and info on the website is not sufficient to inform all residents of Dacorum, especially during these times and urgently needs reconsideration.</p>
Included files	
Title	Housing Delivery
ID	EGS8696
Person ID	1266706
Full Name	Ms Jane Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	1 OBJ – BER – AHST – INFR - GRO
Housing Delivery 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	
Title	Housing Delivery
ID	EGS8794
Person ID	1266787
Full Name	Caroline Millson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<u>OBJ BER</u>
Housing Delivery comment	I am not against building of new homes of the 2 and 3 bedroom size so that young people can afford first homes. However Berkhamsted constantly builds more and more homes of 5 and 6 bedroom status at high end prices and on green land and I object to this.
Included files	
Title	Housing Delivery
ID	EGS8795
Person ID	1261814
Full Name	Liz Uttley
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ
Housing Delivery comment	<p>DM2 More clarity on what constitutes a genuinely affordable home is needed. We know that 80% Market Rate is not affordable, for an area like Dacorum, where the average house price is 12 times the average salary (average median in both cases) this in fact means that genuinely affordable will only be reached at 33% market rate. I do not expect this to be possible, but I would appreciate more ambition.</p> <p>DM5 & DM6 Conversions and residential annexes should be held up to the same standard of carbon emissions as new dwellings, unless other policies prevent this (eg listed building, conservation areas).</p>
Included files	
Title	Housing Delivery
ID	EGS8858
Person ID	1266801
Full Name	Jane Oliver
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS – GRBT - INFR
Housing Delivery comment	<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>

Dreadful destruction of Green Belt
Threat of overwhelming the local resources and facilities.
Rethink this plan with consideration of the above concerns and the views of the residents and voters.

Included files

Title Housing Delivery

ID EGS8872

Person ID 1266814

Full Name Eric Juster

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBJ - GRO - HOUS - INFR - BAGI - GRBT

Housing Delivery comment

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.

Included files

Title Housing Delivery

ID EGS8969

Person ID 1266893

Full Name PENNY HARRISON

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ HOUS

Housing Delivery comment

- 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.

Included files

Title Housing Delivery

ID EGS9027

Person ID 1267011

Full Name Mr Louis Quail

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Officer Comment	OBJ – HOUS, GRBT, BAGI
Housing Delivery comment	<p>Housing</p> <p>How can it be sensible to build houses that developers want to build without considering what will actually solve the housing crisis , these homes that you want to build (like the Bearroc park estate on Shooters Way) seem to be like the Battersea Power Station estate in London , they are for rich people only many of whom don't even live in this country . You need government intervention to solve the housing crisis the market can not do it alone.</p> <p>Surely there is a prerogative to only build on Brownfield estates rather than remove green belt land from communal enjoyment for ever; restarting urban sprawl. If we need to go higher then so be it , I would rather build more intelligent and attractive tower blocks like the Kodak building in Hemel (in proportion) on brown field sites rather than encourage urban sprawl to the detriment of the natural world .</p>
Included files	
Title	Housing Delivery
ID	EGS9064
Person ID	1267065
Full Name	M BALAC
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ GRBT
Housing Delivery comment	Also, there have been reports in. The press that the data the plan is based on is now outdated and is therefore void . I would like to request that a radical re structure and re draft of the plan is made to ban building on greenbelt areas to protect Dacorum for future generations.

Included files	
Title	Housing Delivery
ID	EGS9074
Person ID	1267067
Full Name	KATHRYN BROWN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV
Housing Delivery comment	Housing Delivery: is it really possible to ensure that 40% of the new homes will be Affordable Housing? In the Berkhamsted area this seems rather unlikely.
Included files	
Title	Housing Delivery
ID	EGS9100
Person ID	1267074
Full Name	Joanne Howe
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO BER

Housing Delivery comment	(14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS9235
Person ID	1264686
Full Name	Suzanne Doubleday
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS BER
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS9288
Person ID	1267333
Full Name	JO MURPHY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS9304
Person ID	1267332
Full Name	Nandi Jordan
Organisation Details	Chair Berkhamsted and Tring Labour Party
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ
Housing Delivery comment	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. 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.
Included files	
Title	Housing Delivery
ID	EGS9321
Person ID	1267341

Full Name	ANDY WESTWOOD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO HOUS AHST GRBT
Housing Delivery comment	<p>I object to the housing plan on the grounds that it is disproportionate in the totals for each of the areas - Hemel Hempstead, Berkhamsted and Tring - and that the formula that has created these high target numbers is fundamentally flawed (see here: https://www.building.co.uk/news/jenrick-abandons-mutant-housing-algorithm-to-focus-on-urban-development/5109569.article).</p> <p>Dacorum, in conjunction with MHCLG, should revise the numbers and the plan and they should be significantly lower. Furthermore, in any revision there should be much more detail provided on infrastructure assessments and improvements (eg traffic, clean air and capacity of schools, GPs and social care etc) and how they will be provided, including through Section 106 agreements.</p> <p>The existing green belt and recreational locations, including all school playing fields should be protected and any development must prioritise brownfield locations or sites within existing built on areas. Where development is permitted in any future plan over this timescale, it should be clearly set out which sites are priorities in next 5-10 years and which will only be developed in the longer term (ie after this time).</p> <p>There should be full economic assessments of where people will work, including impacts on travel and public transport as well as a comprehensive local economic development plan for Dacorum as a whole. This should include appropriate liaison and joining up with other local authorities and a clear understanding of where housing and local development strategies are complementary. This should include neighbouring boroughs and also major employment/economic centres nearby such as London and Milton Keynes. This is particularly important given the proximity of Dacorum to these locations (and its distance/isolation from other parts of Hertfordshire including the main centres within Herts CC).</p> <p>Lastly, any developments that are permitted to take place within such a revised plan, should prioritise affordable housing and homes with the highest environmental standards. Plans should demonstrate how they will contribute to national and</p>

local 'net zero' targets not just through building standards, but also through energy usage and reduced car use including for commuting, access to schools, local recreational facilities etc).

Included files

Title Housing Delivery

ID EGS9344

Person ID 1267365

Full Name Mr Jont Cole

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBJ NOC

Housing Delivery 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 Housing Delivery

ID EGS9413

Person ID 1267392

Full Name TANYA VERBEEK

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO BER
Housing Delivery comment	(14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS9475
Person ID	1157289
Full Name	Rodney O'Callaghan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	

Title	Housing Delivery
ID	EGS9529
Person ID	1267427
Full Name	Megan Humphreys
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV – BRAG HOUS
Housing Delivery comment	With regard to housing delivery the council's intention is to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS9551
Person ID	1267433
Full Name	John McDonough
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS BER

Housing Delivery comment	<p>1 There is a very obvious danger that building expensive family homes creates unfairness, tension and division with people within Northchurch, Berkhamsted and beyond. The salary level which would be required for a couple to be able to buy one of these houses is significant and without rich parents, means they are only available to people who have equity and are likely to be moving into the area. I was one of those people. Provision has to be made for people who do very valuable and important jobs that we all need and rely on, but just don't have the earning potential to afford one of those houses. We've had enough division over recent years and do not need to create more. I would hope you'll be aware of schemes introduced elsewhere in the country including Cornwall and the Lake District to enable local people to be able to buy a house where they live, not be forced to move.</p> <p>In summary, I understand the pressures around this and broader challenges which local authorities and government face around the UK, having worked with them for over 20 years. Hitting short-term targets and being cajoled by Whitehall departments does not always serve people, other than getting a politician off the hook.</p> <p>Dacorum is better than this.</p>
Included files	
Title	Housing Delivery
ID	EGS9564
Person ID	1267440
Full Name	Mick Maloney
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<u>OBJ HOUS GRBT GRO</u>
Housing Delivery comment	<p>As a former Councillor I'm disappointed to read the Council are considering a development plan that means building on existing green belt land.</p> <p>Where to build and how best to make use of land in the Dacorum area is not a new problem, for us or any other local council. I'm sure we all agree we need new homes but these ALL need to be affordable. They need to be COUNCIL homes, not run by Housing Associations that make money from all the 'services' provided – gardening, decorating communal areas, managing parking, etc.</p>

Included files	
Title	Housing Delivery
ID	EGS9565
Person ID	1264246
Full Name	Steve Burdekin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	Most of these properties are way above, not only the national but local average house price. Affordable housing is more of a priority than expensive and executive properties, but this is where the developers make most of their profits.
Included files	
Title	Housing Delivery
ID	EGS9571
Person ID	1267442
Full Name	Teresa Adams
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – GRO – HOUS – AHST – ENVH – BK07

Housing Delivery comment	<p>I do not want to see anymore 4&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&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>
Included files	
Title	Housing Delivery
ID	EGS9582
Person ID	1267450
Full Name	Mrs Ruth Taljaard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS – URBD – AHST – INFR – BAGI – GRBT – BK07
Housing Delivery comment	<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"> You MUST also develop NEW ROAD. This pathway is already NOT SAFE. My children have to walk along it to go to their school (St Marys CofE) and I often get hit by van side mirrors as they pass. Imagine if that was a child!!!! The pathway needs to be widened, even at the cost of vehicles. Our children's safety is paramount!

- You MUST develop the bridge on New Road. It is a single track bridge over the canal. Yes it is beautiful to look at. But it is not SAFE, especially for our children. There is no safe way to cross the road from the path to the canal path. This bridge must be developed into something that is safe for our children to walk across and over. Especially as there is a school next to it.
- The canal path must be upgraded. It gets so muddy in the winter. It must be pathed or concreted in order to sustain the proposed increased foot-fall.
- I don't think that one road access to a residential area is wise. I think two ways in and out is safer.
- Cars already SPEED down New Road and the High Street - especially near the school and the Northchurch playing fields. What do you propose to do to keep cars and all this new traffic obeying the speed limit and keeping our children safe? Especially with the proposed new amount of vehicles to be using it.
- You MUST develop at least a footbridge (with cycle path) over the canal and river, across from Lock Field over to the Northchurch playing fields/Tesco. This will keep any children who then live in Lock Field safe, away from the roads, so they can visit the park/shops without having to use the VERY DANGEROUS New Road and High Street pathways.
- If children live on Lock Field - you must also develop the footpaths on the High Street as well. Children will want to access Tesco and the Northchurch Playing fields. People park cars on pathways, which are already un-safe, small as it is. There have been times I've had to push my babies in a pram IN THE ROAD due to cars being parked on the pavement! You MUST double-yellow-line all along those pathways!
- You are developing a 'green-belt' area. Firstly, by doing this you are making your 'rules' void. How do you expect anyone in Dacorum to respect you, believe what you say or take you seriously if you develop on a 'green-belt' area? Secondly, how do you plan to keep it 'green'? Are you asking the construction company to include minimum of 2 trees and 3 shrubs per home?
- Instead of building 60 tiny homes that are ugly and bad for the environment. What about building 40 homes that have larger gardens, more trees and shrubs and keep the area vaguely 'green'?
- Will the new houses be 'green' in the sense of - they will all have solar panels and other sources of renewable energy? It is a green-belt area.
- I'm no wild-life expert...but this is not an urban area (such as an old factory in a city being replaced with residential) - this is countryside. Many animals will live there. I myself have seen king fishers, ducks, herons, foxes, badgers, and much more wildlife along that stretch of the canal. You are killing their homes. Not only in the long run, but in the short term - while all the horrible machines are there digging and making noise. What are you doing to protect the wildlife that lives here? Are you planning on keeping a minimum 10 meter wildlife 'belt' between the canal and any potential housing? If this 'belt' is grass - will you plant more trees and shrubs to encourage wildlife to return after the bombardment of a building sight?
- You must add a footpath from Lock Field into Ashridge. So people can walk directly from Lock Field into Ashridge without having to use the foot path on New Road - again, this is too thin and not safe compared with the speed of traffic.
- Everywhere in Berkhamsted and Northchurch there are parking issues. Please can you design the new residential area to cope with the amount of vehicles. For example, plan houses to have ample driveways and garages for

residents and guests. And double yellow the surrounding roads to STOP people from parking on footpaths. This is not safe for children. Again, if making safe footpaths means building 40 houses rather than 60 - then do it. Make this estate so that bin lorries and fire engines can EASILY drive everywhere (whilst keeping their bin collectors safe!)

- What about social responsibility? Is this new estate designed for middle and upper-class people? Or is it for everyone? Even working class? Are you mixing social housing between the large detached houses?
- How are you planning to future-proof this estate? Are you planning footpaths to be wide enough for two wheel chairs to pass each other safely? This would also be a safer width of path in case there is another pandemic and people have to keep 2 meters away from each other. Are you adding cycle paths? I think if you are serious about the environment then you should include cycle paths EVERYWHERE - even on New Road and the High Street. Even if cycling does not prove to be popular - you are future-proofing this space for things such as hovercrafts or the food-delivery-robots that you see even today in Milton Keynes. Everywhere footpath in Berkhamsted FAILS for safety. Lets make this new estate safe.
- Repair local roads after development. As seen on the new estates up Durrants Lane - the amount of construction traffic (and its pollution) has ruined the roads. Will you repair and redevelop the roads after this estate has been built?
- All of these new houses (both in Berkhamsted, Northchurch, Tring etc) will create a LOT more traffic on the road. How do you plan to future develop the T-junction next to St Marys School between New Road and the High Street? There is no safe crossing for children over New Road AT ALL! And it is next to a school!!!
- You MUST develop the infrastructure. How will you develop the Tesco shop parade and parking to deal with greater numbers? How will you develop local doctors and dentists to deal with greater numbers? Which hospitals are due to take on these greater numbers of people and how are you contributing to their development too?

To summarize; I know that growth is inevitable. But you MUST do it WELL and RESPONSIBLY, for the future of our area, our children and our wildlife.

I'm more than happy to talk to someone or detail my thoughts further. I'm happy to provide photographs of cars parked on pathways everywhere, videos of cars nearly hitting myself and my children walking to school etc etc.

If you build this Lock Field estate then do it WELL. Be innovators, be planet-protectors, be an inspiration to other areas who seek to grow too.

Included files

Title Housing Delivery

ID EGS9599

Person ID 1263214

Full Name Mr R Pope

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ
Housing Delivery comment	<ul style="list-style-type: none"> 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? 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?
Included files	
Title	Housing Delivery
ID	EGS9600
Person ID	1267455
Full Name	Ms C Wilby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ
Housing Delivery comment	<ul style="list-style-type: none"> 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?

- 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?

Included files	
Title	Housing Delivery
ID	EGS9621
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV – HOUS BER
Housing Delivery comment	(14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. How will this be achieved in Berkhamsted - an area of very high property and rental value? The Plan does now explain how this will be achieved.
Included files	
Title	Housing Delivery
ID	EGS9635
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV – BRAG HOUS
Housing Delivery comment	(14) Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS9645
Person ID	400471
Full Name	Mrs Ruth Constable
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ TRI HOUS
Housing Delivery comment	DM5 suggests converting houses to flats and non-residential sites to housing. I strongly agree with this suggestion. I think that this principle has not been sufficiently pursued in relation to the proposed development in Tring. There is a need to look more closely at what housing could be provided within Tring's boundaries.
Included files	
Title	Housing Delivery
ID	EGS9674

Person ID	1267468
Full Name	Chris Berry
Organisation Details	CPRE Hertfordshire
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS, GRBT, LAND
Housing Delivery comment	<p>CPRE Hertfordshire urges the Council to review the Guiding Development section of the Consultation Plan in the context of the changes sought in our representations, to the proposed strategy and the excessive scale of development therein, latest government planning policy and regulations, and the new evidence available on household and population trends. This is particularly necessary for Chapters 14 on Housing Delivery and 15 on Economic Development.</p> <p>Policy DM3 on Rural Exceptions should be carefully reworded to ensure that only proposals that meet a genuine need that cannot be met in any other way are permitted in the Green Belt or designated area, including the AONB, and that this does not therefore include dwellings that can be sold on to a household that does not have such a need.</p>
Included files	
Title	Housing Delivery
ID	EGS9707
Person ID	1267479
Full Name	Roger Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV

Housing Delivery comment	<ul style="list-style-type: none"> 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
Included files	
Title	Housing Delivery
ID	EGS9719
Person ID	1267480
Full Name	Paul Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS9775
Person ID	1267528
Full Name	Clare Williams
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Officer Comment	OBJ – THAK – GRO – HOUS – AHST - GRBT
Housing Delivery comment	<p>Firstly, I would like to record my opposition to the proposed development at Bulbourne Cross. I am very concerned about the level of marketing they have been able to use and wonder how this is allowed as separate to the overall plan, if Dacorum borough council are not allowed to market in the same way then surely this is unfair competition.</p> <p>I also want to record my opposition to the scale of the proposed Local plan at Berkhamsted due to the fact that it includes building on green belt land and does not adequately address the issue of increased traffic and pollution in such a small town.</p> <p>I would also like to request that more council housing is built and smaller more affordable housing rather than all the huge very expensive housing that seems to be evident in the current housing development off shooters way.</p> <p>I am pleased to see proposals for new schools but we need more on accessibility into the town for all (bus routes and safe cycle paths).</p> <p>I would also like to comment that the website for making comments online to the proposal was very difficult to navigate, I tried several times but had to come back to email.</p>
Included files	
Title	Housing Delivery
ID	EGS9876
Person ID	1267757
Full Name	SIMON SMITH
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ GRO HOUS AHST INFR BK02 BK03 BK04 BK05
Housing Delivery 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.

Included files	
Title	Housing Delivery
ID	EGS9886
Person ID	1267759
Full Name	PETER AND TRACY DUDLEY

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO HOUS GRBT COVID
Housing Delivery comment	<p>We are writing to object to the plan for development in Dacorum for the following reasons:</p> <p>The number of houses proposed for development per year until 2038 is based on figures produced in 2014, we understand that this proposes a figure of 1,023 houses being built in the area. These figures are now outdated and we're 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.</p> <p>Secondly, green belt has been defined as land that can only be developed upon in exceptional circumstances. Despite the statement in the plan, the simple need for extra housing cannot be defined as exceptional.</p> <p>Thirdly, resources cannot support the extra houses currently and there is nothing in the plan that states how this will be resolved. In particular, water extraction is at the maximum it can support without the extra supply that will be needed for these developments.</p> <p>Fourthly, there has been insufficient effort to locate brownfield sites in preference to releasing greenfield sites for development.</p> <p>Fifthly, the proportion of social housing proposed is far too low in comparison with the waiting list of 7,000 awaiting housing. It should be ensured that housing meets the needs of the people looking to be housed locally.</p> <p>We are also concerned that there has been insufficient publicity of the plan to ensure that people know what is happening. It is apparent that a significant number of people did not receive a copy of the plan in the post. We did not receive one and had to request it very late on in the available time for consultation because we were unaware of it.</p> <p>Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law". The same should be done for Dacorum.</p>
Included files	
Title	Housing Delivery
ID	EGS9922

Person ID	1267776
Full Name	Will Garbutt
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ - HOUS - AHST - BAGI - GRBT - BER - TRI
Housing Delivery comment	<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 & 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"> 1 No thought to the impact on the impact on congestion of roads which are small and largely already in a very bad state. 2 This is greenbelt land and needs to be conserved for delicate ecosystems of wild animals, insects, plants and trees. 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. 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.
Included files	
Title	Housing Delivery
ID	EGS9927
Person ID	1267774
Full Name	AATMA SEESURRUN
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ - HOUS
Housing Delivery comment) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS9945
Person ID	1267786
Full Name	BRYONY GLENN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<u>OBJ GRO BAGI ENVH FRAD INFR</u>
Housing Delivery comment	There also appears to be very little affordable housing in the plans which is what is needed rather than large executive houses (which of course are far more profitable for developers but are not what is needed). The environmental impacts have been paid scant regard - as well as the loss of high quality green belt countryside, water and water waste disposal is likely to have significant impact on the chalk streams which are unique to this area.
Included files	
Title	Housing Delivery
ID	EGS9979

Person ID	1159323
Full Name	Charlotte Grange
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<u>OBJ GRBT GRO HGC</u>
Housing Delivery comment	I'm also concerned about the largely unaffordable nature of the housing proposed. At most, Dacorum states that only 40% of housing build would be affordable, which is well below half. This is shameful. The green belt is environmentally, economically, and medically priceless to the population, and if we were to use it for housing, that housing should surely be affordable, or else why is the council using their Plan to discuss solving, or at least mitigating the housing crisis? Hemel Hempstead is a working class town and the council should better understand the needs of its populace.
Included files	
Title	Housing Delivery
ID	EGS10026
Person ID	1267862
Full Name	ALEX CHAPLIN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ - HOUS

Housing Delivery comment	<p>— 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.</p> <p>— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.</p> <p>— 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.</p> <p>— 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.</p>
Included files	
Title	Housing Delivery
ID	EGS10051
Person ID	1155402
Full Name	Christopher Stafford
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – BRAG HOUS
Housing Delivery comment	<p>(14)</p> <p>Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.</p>
Included files	
Title	Housing Delivery
ID	EGS10085
Person ID	1268034

Full Name	MR IAN GUNTER-JONES
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV GFRA HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS10103
Person ID	1268045
Full Name	C PERRY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OB HOUS

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS10127
Person ID	1146091
Full Name	Mr John Foster
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ EV HOUS
Housing Delivery comment	<p>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.</p> <p>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.</p> <p>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.</p>
Included files	
Title	Housing Delivery

ID	EGS10182
Person ID	1268084
Full Name	KATIE FERGUSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - SUP BRAG - AHST - INFR - GRBT
Housing Delivery comment	<p>Please take this email as my formal response to the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Consultation.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>To build on my support for BRAG :, there are a number of concerns that have been raised around the viability of this plan, particularly around the impact in significantly reducing existing green belt land (going against government recommendations) and putting increasing pressure on the town's already strained infrastructure. There are no clear exceptional circumstances that can provide a reason for this type of rapid over development. Berkhamsted and Tring are both towns where the surrounding countryside is a significant factor in their character, appeal and history, with the proposed plans drastically reducing this and having a significant negative impact for residents and visitors. As someone who sees outdoor recreation as a key part of their lifestyle, this also will destroy my (and others) enjoyment of the green space that surrounds Berkhamsted, with the ease of reach being a key factor in its appeal. The green space is home to hundreds of diverse species and environments; building on it will further damage flora and fauna.</p> <p>As more and more towns across the UK are being "swallowed up" by vast amounts of housing and attempts at regeneration, Dacorum should not go in the same way. The road and traffic infrastructure is not sufficient to handle additional volumes, and there is no ability to "create more roads" therefore it will only add to the problems of congestion and pollution as has been identified. The locations of the proposed sites at the top of the valley will only exacerbate - many will choose to avoid walking or cycling up the hill and therefore have an even greater multiplier effect on the number of cars being used.</p>

Similarly, having commuted from Berkhamsted into London for a number of years, it is incredibly evident that trains are already at (and over) capacity.

Included files

Title Housing Delivery

ID EGS10226

Person ID 1268167

Full Name CHRIS YOUDELL

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment SUP BER

Housing Delivery comment Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.

Included files

Title Housing Delivery

ID EGS10310

Person ID 1268339

Full Name Mr Adam Craig

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Officer Comment	OBJ – URBD AHST EMPL BER
Housing Delivery comment	<p>Do you have any specific comments about the guiding policies?</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>
Included files	
Title	Housing Delivery
ID	EGS10319
Person ID	1268350
Full Name	Mrs Tamsyn Craig
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ – URBD AHST EMPL BER
Housing Delivery comment	<p>Do you have any specific comments about the guiding policies?</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>
Included files	
Title	Housing Delivery
ID	EGS10340

Person ID	1268418
Full Name	JOSEPHINE O'NEILL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	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.
Included files	
Title	Housing Delivery
ID	EGS10402
Person ID	1268432
Full Name	SARAH STUBBS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ BER
Housing Delivery comment	Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.

Included files	
Title	Housing Delivery
ID	EGS10454
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ NOC
Housing Delivery comment	Affordability is poorly defined in The Local Plan. Too often 'Affordable Housing' is not affordable. We agree with other local political parties that 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 central London.
Included files	
Title	Housing Delivery
ID	EGS10491
Person ID	869129
Full Name	Ms Ann Hetherington
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Officer Comment	OBJ GRO
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS10558
Person ID	1268702
Full Name	Kirstin Chaplin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ – HOUS AHST BER COVID EMPL RETL
Housing Delivery comment	<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>

Included files	
Title	Housing Delivery
ID	EGS10569
Person ID	1164729
Full Name	David Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS10722
Person ID	1145421
Full Name	Mrs Shirley White
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – BRAG HOUS
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS10737
Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	<u>OBJ</u>
Housing Delivery comment	Housing Delivery: 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. 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.
Included files	
Title	Housing Delivery
ID	EGS10768

Person ID	1268759
Full Name	Mrs Catherine Rudin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ SP4
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS10781
Person ID	1268762
Full Name	Mrs Natalie Hill
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ SP4

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS10790
Person ID	1268763
Full Name	Mr Michael Hill
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ SP4
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS10813

Person ID	1268768
Full Name	Amanda Stafford
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable. (17)
Included files	
Title	Housing Delivery
ID	EGS10865
Person ID	1152225
Full Name	GILLIAN JOHANSSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – BOV HOUS
Housing Delivery comment	1 Housing – It is essential that the development should reflect the diverse housing needs of the local population. Bungalows seem to have fallen out of favour in Dacorum and those that we did have in

Bovingdon, have now been converted into 3 or 4 bedroom properties. In view of the ageing population, residents of Dacorum now have to stay in their existing 4/5 bedroom houses or move to McCarthy and Stone type developments or nursing homes. Should the over 65s have suitable properties to downsize into locally, then larger properties would become available to younger families. In view of your own figures, the need for bungalows will become greater over the next 20 years. One would expect them to become a priority within your Plan but this is not in the interest of developers as they generate a lower profit margin. We would therefore expect bungalows to receive the same priority as affordable housing has done. Obviously, this would also help with generational integration.

Included files

Title Housing Delivery

ID EGS10898

Person ID 1268814

Full Name Ms Emma Cotton

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBSV - HOUS

Housing Delivery comment 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.

Included files

Title Housing Delivery

ID EGS10931

Person ID 1059452

Full Name Mrs Angela Whitehead

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<u>OBJ GRO HOUS</u>
Housing Delivery comment	Worryingly the number of houses for social need is very small, if we are building houses surely there should be priority for those without homes. In general terms I think this is a very poor plan and do not support.
Included files	
Title	Housing Delivery
ID	EGS10935
Person ID	1268871
Full Name	Ms Karla Hatrick
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ - HOUS - FRAD - TRI - TRDS - COU
Housing Delivery comment	I've been trying to recover my password in order to make a comment on the strategic plan, but though the website says it has sent me a link to reset my password, I have still not received a reset email. I cannot print off the pdf consultation document either so have no other way to reply other than a direct email. May I therefore submit some comments in this email?

We recently heard- last week-of the inclusion of Long Marston as a potential site for 3,000 houses, as part of Dacorum's strategic plan. I realise that it is one of many options, but the fact that it is proposed at all, is extraordinary.

Long Marston's name means Long Marsh, we are a wet, rural area with increasing flood problems, and wet habitat offering unique spaces for rare and protected species e.g. black poplars and greater crested newts. The village flooded several times in the last months. Our roads are too narrow for even 2 cars to pass, in many places. We have a conservation area and listed buildings. Yet of all the places to suggest new houses, we are a potential site? I believe strongly in local democracy, but I wonder then if anyone from Dacorum who has been involved in writing the report has visited the site in question, or spoken to residents, and would perhaps like to do so after wet weather. We certainly, as a village, have had no notification of the potential for building, no discussion, no consultation.

So if you're looking to build houses on a flood plain, to increase flooding for others in the village, and to build houses which will become uninsurable when they too flood, on small narrow roads with potholes far from any major road network, where community cohesion will be ripped apart as all locals who know of the plans object, where rare local species will be negatively affected, green sites destroyed, conservation areas made pointless, then what a great choice. This kind of proposal is precisely what makes people lose faith in the competence of local decision making.

Included files	
Title	Housing Delivery
ID	EGS10957
Person ID	1268886
Full Name	Mr Paul Jayson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV – BRAG HOUS

Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS10984
Person ID	1162376
Full Name	Jade Holmes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS10994
Person ID	1268904
Full Name	NICOLA MAGUIRE & MARK BONAR

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS11017
Person ID	1268908
Full Name	Molly Berry
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Officer Comment	OBJ GRBT
Housing Delivery comment	The fact that much of the land to be developed was purchased very cheaply, due to it having been Green Belt at the time of purchase, <u>offers DBC another wonderful opportunity</u> . These developments can be of truly affordable homes, for our nurses, teachers, plumbers, bin men, and all those that our communities rely on. We have no need for any more £500,000 homes in this area.
Included files	
Title	Housing Delivery
ID	EGS11041
Person ID	1145445
Full Name	Mr Jason McInerney
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – GFRA HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery

ID	EGS11109
Person ID	1268939
Full Name	Ms Sylvia O'Brien
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – GFRA HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS11240
Person ID	1268990
Full Name	Mr Nick de la Bedoyere
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	OBJ SP4
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS11258
Person ID	1268893
Full Name	Mr Martin Hopping
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>

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 Housing Delivery

ID EGS11287

Person ID 1268994

Full Name Mrs Julie Hopping

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ HOUS

Housing Delivery 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 Housing Delivery

ID EGS11297

Person ID 1268998

Full Name Mr Philip Hodgson

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ
Housing Delivery comment	I think they are out of date given Gov changes in Policy and decisions to change policy made by surrounding authorities.
Included files	
Title	Housing Delivery
ID	EGS11310
Person ID	1269000
Full Name	Mrs Tracey Franklin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS BER
Housing Delivery comment	Affordable Housing If it is proposed that the current government guidance of 80% of market value is used, the majority of local people will not be able to afford to live in these developments. The town should be made up of a diverse society in regards to wealth and therefore should be catered for appropriately.
Included files	
Title	Housing Delivery

ID	EGS11317
Person ID	1269002
Full Name	Mr Paul Galgey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	SUP – PWCG HOUS COU GRBT LAND
Housing Delivery comment	<p>Rural Exception Sites</p> <p>In principle, we support the proposed rural exceptions strategy detailed at Policy DM3 – Rural Exceptions. It is vital that suitable development sites are actively promoted within the development plan to provide affordable housing to meet identified local needs.</p> <p>National planning policy promotes opportunities to bring forward affordable homes on rural exception sites. Paragraph 77 of the National Planning Policy Framework (NPPF) (2019) outlines that planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this.</p> <p>The Emerging Strategy for Growth recognises the need to significantly increase the number of affordable homes that are genuinely affordable to local people. Specifically, it is identified at Table 6 that Dacorum requires 363 affordable units for rent and 248 affordable units for home ownership to be delivered per annum. Rural exception schemes will play a key role in meeting these needs and, as noted at paragraph 14.4, <i>“such housing will support local services and enhance or maintain the vitality of rural communities”</i>.</p> <p>Draft Policy DM3 (‘Rural Exceptions’) sets out that schemes of up to 10 dwellings for local affordable homes will be promoted in and adjoining selected small villages in the countryside as established in Policy SP3 (‘The Settlement Hierarchy’). The policy notes that it is anticipated that rural exception schemes will be for 100% affordable homes; however, enabling market housing within such schemes may be acceptable subject to the provision of comprehensive evidence that it is essential to secure the delivery of the affordable component. We support this flexibility in ensuring that the delivery of rural exception schemes are not undermined by viability issues.</p> <p>The emerging Strategy for Growth identifies villages including Albury, Long Marston and Wilstone as the largest settlements within the Rural Area. Paragraph 14.4 preferentially directs appropriate development to these settlements ahead of rural</p>

settlements within the Green Belt or the Chilterns AONB, stating that rural exception sites and entry-level exception sites “need to be on suitably sized, designed and located sites outside of the Green Belt and Chilterns AONB. This would limit their location to Long Marston and Wilstone”. Further, paragraph 19.17 states that “the Plan allows for the principle of more development opportunities in Aldbury, Long Marston and Wilstone than the equivalent selected villages in the Green Belt”.

Given that 60% of land in Dacorum is designated as Green Belt, it is important that villages such as Wilstone, that are less constrained in policy terms, are used effectively to provide deliver sensitive, appropriate development. This sequential approach will minimise and manage the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites. We therefore support part 3 of draft Policy DM3, which states, “entry-level homes in accordance with the NPPF will similarly be supported as an exception in locations in the Rural Area at Long Marston and Wilstone”.

We highlight concern in terms of limiting the size of rural exception schemes to only 10 dwellings, which conflicts with footnote 33 of the NPPF, which states that “entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement”. The policy wording should be amended in this regard to allow flexibility.

We submit that the delivery of rural exception schemes that exceed 10 units will be of greater benefit to the District in seeking to meet its rural affordable housing needs. Larger schemes offer a greater critical mass of new affordable homes rather than relying on an accumulation of minor development proposals, thus providing a more tangible contribution towards affordable housing delivery. This is especially important because so much of the land within the Borough is statutorily protected from inappropriate development by virtue of it being Green Belt.

In summary, we consider that the proposed strategy for rural exception housing is positive and proactive in its approach. The proposed approach of guiding development to the most suitable village locations within the Rural Area outside of the Green Belt is both logical and sustainable. However, we suggest that the restriction on development size is amended to accord with the NPPF and allow greater flexibility for sites to make a bigger difference to contributing towards affordable housing targets.

Included files	
Title	Housing Delivery
ID	EGS11345
Person ID	1269008
Full Name	Mr Steven Kerry
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Officer Comment	OBJ PWCG
Housing Delivery comment	<p><u>Policy DM3 – Rural Exceptions</u></p> <p>We support this policy in principle however the restriction of 10 units should be removed. The policy should generally follow the threshold in Paragraph 71 of the NPPF i.e. sites should not be larger than 1ha or exceed 5% of the size of the existing settlement. This unnecessary restriction will limit the amount of affordable housing to be delivered on suitable sizes which could otherwise accommodate a greater number of units without significant adverse impacts.</p> <p><u>Policy DM9 – Housing for older people</u></p> <p>We support this policy principally in seeking to deliver the housing needs for older people however, although retirement housing and extra care housing are stated, for absolute clarity the policy should identify what is deemed C2 development and what is C3 development under the Use Class Order.</p> <p>Furthermore, whilst the policy affords support for the delivery of such housing, there is no guarantee that scheme for this type of housing will be forthcoming and therefore that the identified needs will be met. Instead, sites should be allocated in appropriate locations specifically to deliver housing for elderly people. This will ensure the identified needs will be met and in areas which are best suited for older people.</p> <p><u>DM12 – Nationally Described Space Standards</u></p> <p>Our comments in respect of Policy DM12 mirror that conveyed by the HBF in that there should be a degree of flexibility in the policy wording in order to combat the issue of housing affordability in the area. Whilst Rectory Homes are committed to providing high quality housing on all of our schemes, in some cases the ability to provide slightly smaller units than the optimal space standards as currently defined would enable the homes to be set at more affordable prices. Such units would be appropriate in all other aspects and would still achieve the standards set by the remaining policies in the emerging Plan.</p>
Included files	
Title	Housing Delivery
ID	EGS11352
Person ID	221830
Full Name	Mrs Baerbel de la Bedoyere
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ SP4
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS11383
Person ID	1207629
Full Name	Strategic Planning Department
Organisation Details	Strategic Planning Department Three Rivers District Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	NOC
Housing Delivery comment	<p>Policy DM2 – Affordable Housing: We support the 35-40% requirement for affordable housing in Policy DM2, given the mutual significant need for affordable housing across South West Herts. Three Rivers would also encourage that a higher level of affordable housing provision is tested in the viability assessment of the Plan in order to determine whether a higher percentage may be justified. If possible and justified, seeking a higher percentage of affordable housing provision would help to further meet the significant affordable housing needs identified in Dacorum and across South West Herts.</p>

It would be helpful to include clarification on why a lower percentage of affordable housing provision (35%) is required on major developments in the Hemel Hempstead area.

A split between affordable housing for rent and affordable home ownership has not been stated in the policy. It is unclear as to whether this is because the policy accounts for the Government's proposed First Homes scheme which would require 25% of the affordable housing to be comprised of First Homes. The outcome of the First Homes consultation is still uncertain but clarity in future iterations of the Local Plan as to the required proportions of affordable housing for rent and affordable home ownership would be helpful, recognising that the Local Housing Needs Assessment recommends seeking as much affordable housing to rent as viability allows.

Included files

Title Housing Delivery

ID EGS11384

Person ID 1207629

Full Name Strategic Planning Department

Organisation Details Strategic Planning Department
Three Rivers District Council

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment NOC

Housing Delivery comment Policy DM11 – Density of Development: We welcome this policy and the approach taken to increase densities based on thresholds relative to surrounding average densities in different areas.

Included files

Title Housing Delivery

ID EGS11423

Person ID 1269025

Full Name JOHN MAWER

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBS NOC
Housing Delivery comment	14. Housing Delivery The delivery of traveller site is a good example of what I referred to earlier. The vision and the reality rarely match, and this is seen in the reality of traveller sites currently. The site at LA3 does not meet the standards required of current national and local policy.
Included files	
Title	Housing Delivery
ID	EGS11441
Person ID	1264362
Full Name	Juliet Miller
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	Housing Delivery: 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.

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.

Included files

Title Housing Delivery

ID EGS11486

Person ID

Full Name

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OJ NOC

Housing Delivery comment I was happy to see mention of affordable housing. But what constitutes affordable housing. What data is the definition being based on? 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. 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.

Included files

Title Housing Delivery

ID EGS11493

Person ID 865014

Full Name Mr Robert Turnbull

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS11512
Person ID	1269117
Full Name	ANITA PARRY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	1 OBJ SP4
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery

ID	EGS11549
Person ID	1269122
Full Name	KATHRYN WHITTLE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<p>The proposed Policy DMS, 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 DMS. Should the plan identify the housing provision that will come from DMS and reduce this figure from the 'total' housing need figure.</p>
Included files	
Title	Housing Delivery
ID	EGS11560
Person ID	1269123
Full Name	KENTON WHITTLE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS11623
Person ID	1158198
Full Name	JACK ARMSTRONG
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBSV
Housing Delivery comment	DM5 - opportunity to deliver house conversions from non-residential properties makes good use of pre-existing developments.
Included files	
Title	Housing Delivery
ID	EGS11648

Person ID	1269150
Full Name	Mrs Helena Parr
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<u>OBJ BER</u>
Housing Delivery comment	<p>Affordable Housing</p> <p>The 40% target of affordable housing seems particularly high. I believe the council should be building a broad range of housing for all socioeconomic groups.</p> <p>With house prices in the area currently very high and Berkhamsted property prices consistently higher than the national average, if it is proposed to use the current government guidance of 80% of market value, the majority of local people will be unable to purchase a house.</p>
Included files	
Title	Housing Delivery
ID	EGS11659
Person ID	1269152
Full Name	SIMON RHEAD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS11680
Person ID	1269212
Full Name	PETER SCOTT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	
Housing Delivery comment	<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>
Included files	

Title	Housing Delivery
ID	EGS11710
Person ID	1269217
Full Name	Mr David Hulse
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ SP4
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS11725
Person ID	1152494
Full Name	MRS G RUSSELL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	OBJ LAND
Housing Delivery comment	<p>Re 14.24; Policy DM2 – Affordable Housing. This should be a higher percentage than the 35-40% figure. Affordable rented housing must of course be made available as well. This means that other more expensive housing must be limited. 1b: There should be a presumption against development in the Chilterns AONB. Cf Policy DM27 – “unless exceptional circumstances prevail”. This would mean only very minor increases in housing, such as homes for children or employees of people who are already permanent residents in the locality, to allow them to remain in the locality.</p>
Included files	
Title	Housing Delivery
ID	EGS11751
Person ID	1269233
Full Name	CIARA KENT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ
Housing Delivery comment	<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>
Included files	

Title	Housing Delivery
ID	EGS11761
Person ID	1118045
Full Name	Mr Padraig Dowd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ – GRO - HOUS
Housing Delivery comment	<p>One principle that is missing is that as you consider additional housing, you should not do so to the detriment of existing residents through the negative impact on existing infrastructure, amenities, recreational facilities, traffic, pollution, etc. You simply should not be able to add additional houses by 'taking away' from what exists, in other words relying on those existing resources to now carry the additional burdens from such new houses. You are taking away from existing residents by diluting their ability to live, school, walk, play, drive, other services, etc. from already over-loaded facilities and infrastructure.</p> <p>The increase in housing units is truly significant and irresponsible planning when placed against current units, particularly in Berkhamsted and Tring. The extent of recent developments some of which are yet to be completed, is apparent in terms of further overloading of traffic, walkers, joggers, people searching for recreational spaces, services, etc. These towns have a physical geography that limits what it can reasonably accommodate; in the meantime, your plan loads it up further when the requirements of healthy and happy living are already being diluted. Apart from the planned increases, the pace of development is likely to be such that there is no opportunity to take account of recent increases as well as planned increases to measure such impacts before it is too late. As one example, I observe the impact of the Taylor Wimpey Bear Roc developments with the absence of additional community spaces, then additional traffic, pollution, not to mind the demand on all other family and social services; more is being squeezed into what already exists. This approach to development cannot continue.</p> <p>You have provided more detail of the location of new houses though some of that is still open to further revision and assessment. Many of these developments further negatively impact such locations without regard and again do not make sense from a number of viewpoints – density, absence of facilities, diluting what already exists, etc. and indeed some planned locations cannot accommodate additional units with major negative impacts.</p>
Included files	

Title	Housing Delivery
ID	EGS11773
Person ID	871625
Full Name	Mrs Clare Francis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS11812
Person ID	398725
Full Name	Mr Valter Johansson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	OBJ NOC
Housing Delivery comment	Housing – It is essential that the development should reflect the diverse housing needs of the local population. Bungalows seem to have fallen out of favour in Dacorum and those that we did have in Bovington, have now been converted into 3 or 4 bedroom properties. In view of the ageing population, residents of Dacorum now have to stay in their existing 4/5 bedroom houses or move to McCarthy and Stone type developments or nursing homes. Should the over 65s have suitable properties to downsize into locally, then larger properties would become available to younger families. In view of your own figures, the need for bungalows will become greater over the next 20 years. One would expect them to become a priority within your Plan but this is not in the interest of developers as they generate a lower profit margin. We would therefore expect bungalows to receive the same priority as affordable housing has done. Obviously, this would also help with generational integration.
Included files	
Title	Housing Delivery
ID	EGS11872
Person ID	1269275
Full Name	KALLIOPI KOUTSOU
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
Officer Comment	1 OBSV - HOUS
Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery

ID	EGS11888
Person ID	1269277
Full Name	DEFINE PLANNING AND DESIGN LTD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	1 OBJ
Housing Delivery comment	<p>Policy DM1 sets the expected housing mix for developments of 10+ dwellings. Whilst that housing mix is a useful indication of DBC's expectations, it may very quickly become out of date and should be clearly expressed as an <i>indicative</i> housing mix in the supporting text, rather than within the policy itself.</p> <p>Rather, the policy should state that eventual mixes should be informed by up-to-date evidence of local housing need (such as Strategic Housing Market Assessments) to ensure that developments meet the needs of local residents. In addition, whilst BHL supports the reference that "<i>housing mix may vary between different sites</i>", the policy should be amended to state that mixes should also respond to site-specific factors such as size, location, constraints, existing mix and viability.</p> <p>BHL fully supports the provision of affordable housing as an integral part of meeting an area's housing needs. However, whilst the 40% affordable housing requirement appears to be informed by the South West Herts Local Housing Needs Assessment, the impact of this requirement must be considered alongside other policy requirements to ensure that the cumulative costs "<i>will not undermine the deliverability of the plan</i>" (Ref. 10-002-20190509). Thus, a full Viability Assessment must be prepared in due course that also considers the impact of the anticipated changes to Building Regulations.</p> <p>However, BHL supports the policy's reference to "<i>judgements about the level, mix and tenure of affordable homes</i>" taking into consideration scheme viability and abnormal costs of development, and the tenure split "<i>taking into account the Council's most up to date evidence on housing need</i>". Indeed, the latter will ensure that affordable housing provision meets existing need at the point of provision.</p> <p>POLICY DM8 – CUSTOM AND SELF BUILD HOUSING:</p> <p>Policy DM8 requires that 5% of houses are made available for custom and self-build (CSB) development on sites of 40+ dwellings, which appears to be informed by a demand for 70dpa arising from the Council's Custom and Self Build Demand Assessment Framework (CASBDAF).</p>

However, it is noted that an individual registering on DBC's CSB register does not necessarily equate to a genuine desire / ability to develop a CSB plot, and that such registers are not means tested. Whilst the text of the CASBDAF recognises that, stating "*only a proportion of households which fit the characteristics are likely to go on to take up CSB*" with "*local costs and value as well as availability of finance*" being key barriers, the demand figure derived from the report fails to sufficiently reflect that.

In any event, a prescriptive blanket approach to requiring 5% CSB provision on all sites of 40+ dwellings does not take account of localised demand, the site- or location-specific constraints to delivery of specialist housing, the potential to undermine the delivery of consistent design principles across a site, or potential impacts on delivery timescales.

In that light, DBC are referred to the position taken during the examination of the Mansfield Local Plan in March 2020. Indeed, whilst Mansfield's submission plan included a policy that required 5% CSB provision, the Inspector duly removed that policy, stating that "*the policy is not supported by evidence to justify [...] the 5% figure*". The Inspector's Report also captured the issues of CSB delivery, particularly including the uncertainty regarding "*the procedures that would apply where plots remain unsold*". BHL's view is therefore that the requirement for CSB housing on all sites should be removed.

POLICY DM10 – ACCESSIBLE AND ADAPTABLE HOMES:

BHL recognise the importance of the provision of accessible housing, but note that NPPF paragraph 35b requires policies to be "*based on proportionate evidence.*" Thus, DBC is required to provide sufficient evidence to justify the policy's requirements. Should that be demonstrated, a Viability Assessment is required to demonstrate that the requirement when considered with the cumulative costs of other policy requirements will not undermine the plan's deliverability (Ref. 10-002-20190509).

Furthermore, the delivery of all homes to (at least) M4(1) standard will result in an increase in plot sizes. Thus, DBC must consider the impact of this policy on development density to ensure that the plan achieves an "*efficient use of land*" in accordance with NPPF paragraph 122.

POLICY DM11 – DENSITY OF DEVELOPMENT:

Policy DM11 states that the supported densities at allocated growth areas "*will be guided by Masterplans and Design Codes to be informed by the site specific allocations and the Dacorum Design Guidance.*" That being said, neither Policy SP16 nor allocation policies HH01 or HH02 provide information relating to suitable densities for the Hemel Hempstead North development.

Clearly, development density is a significant consideration in early scoping work and informs assessments of capacity and viability. Thus, it is BHL's position that Policy DM11 should itself set indicative suitable densities for these sites, given those viability implications. Indeed, the *William Davis Ltd & Ors v Charnwood Borough Council [2017] EHC 3006* decision concluded that policies that have a cost implication cannot be deferred to a Supplementary Planning Document (or alike), and should be dealt with within the LPR process itself.

In setting those indicative values, DBC should take consideration of the average gross densities achieved in 2006 to 2018 (41dph for Hemel Hempstead neighbourhoods), and should also reflect that the Hemel Garden community will

require a balance between more dense development within / surrounding local centres, as well as more traditional Garden Community type development.

POLICY DM12 – NATIONALLY DESCRIBED SPACE STANDARDS:

Policy DM12 elects to adopt the Nationally Described Space Standards (NDSSs), albeit under the caveat that DBC “*will need to justify our approach based on evidence covering need, viability and timing.*” Indeed, the Written Ministerial Statement dated 25th March 2015 confirms that “*the optional new national technical standards should only be required [...] if they address a clearly evidenced need, and where their impact on viability has been considered.*”

For those standards to be adopted, therefore, up-to-date and appropriate evidence is required, and the application of the standards should be considered in a comprehensive viability assessment. That assessment should reflect that, for developments to adhere to NDSS, the density of their development will inevitably reduce (given the NDSS are more space-intensive) and the viability implications of that should also be considered.

It is also suggested that DBC carefully considers the implications of the imposition of such standards on housing affordability (as a result of the additional cost of extra floorspace being passed onto homebuyers) and the potential impact on development delivery rates.

Included files	
Title	Housing Delivery
ID	EGS11915
Person ID	1268937
Full Name	Mrs Lynette Hyde
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – HOUS
Housing Delivery comment	The Government projected numbers of new houses is WRONG and the target must be reduced for the rural area, close to the Chiltern AONB.
Included files	

Title	Housing Delivery
ID	EGS11928
Person ID	1269347
Full Name	Rebecca Braybrooks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ – COVID
Housing Delivery comment	The plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home.
Included files	
Title	Housing Delivery
ID	EGS11983
Person ID	1269352
Full Name	Walid Youssef
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV - HOUS

Housing Delivery comment	Housing delivery. BRAG supports the council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS12005
Person ID	1269353
Full Name	TESSA BARFIELD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS12021
Person ID	1161359
Full Name	D B Land and Planning

Organisation Details	D B Land and Planning
Agent ID	1161362
Agent Name	Nathan McLoughlin
Agent Organisation	McLoughlin Planning
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS MK01 PWCG
Housing Delivery comment	<p>Policy DM1 – Mix of Housing The policy as drafted looks to secure a mix of housing on developments of ten or more dwellings. Table 5 of the policy sets out a housing mix across the Borough. This housing mix details both open market and affordable housing. The concern with the use of a specific mix in policy is that it could become quickly outdated because of changing housing market conditions. Also, the prescribed mix in the policy is somewhat undermined by parts 4 & 5 of the policy that allow for some local flexibility based on a development site and its location and the requirements of a local Housing Need Assessment. It is recommended that Table 5 is deleted from the Plan.</p> <p>Policy DM8 – Custom and self-build Housing Concern is expressed about the requirement in the policy that have housing developments of 40 or more units, 5% of the house plots should be made available as service building plots to enable the delivery of self and custom build properties. In terms of dealing with this requirement, it is considered inappropriate for all sites over 40 dwellings to be required to provide self-build plots. The provision of self-build plots on an allocated site MK01 would raise issues in terms of:</p> <ul style="list-style-type: none"> • The overall relationship of those self-build plots to those that are going to be provided through the normal development process. • This could lead to parts of the site being left undeveloped whilst a potential self- build party comes forward. • It raises the prospect of conflict in terms of the overall design approach put forward for an allocated site and the aspirations of a self-build Applicant as well as the implementation of such a proposal (e.g. conflict with Construction Method Statements) <p>Given the need in the Plan for all allocations to be subject to Site Specific Masterplans, this policy requirement should be deleted and it is best left to individual site allocations to deal with this issue.</p> <p>Policy DM12 – Nationally Described Space Standards Concern is expressed about the inclusion of the National Described Space Standards in the Plan. Currently, the NPPG gives Local Planning Authorities the option to set additional technical requirements exceeding the minimum standards</p>

as required by Building Regulations. However, in so doing there is a need for Local Planning Authorities to produce evidence to demonstrate whether there is a need for additional standards in their area and setting those standards in the Local Plan. Turning to paragraph 14.76, it is clear that the necessary work has not been undertaken to support the inclusion of the policy in the Local Plan. Given this fact, the prescribed standards in Policy DM12 are considered unhelpful at this stage and this policy should be revisited pending evidence becoming available.

Included files	
Title	Housing Delivery
ID	EGS12102
Person ID	1145854
Full Name	Mrs Deborah Doughty
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS12124
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	
Officer Comment	NOC
Housing Delivery comment	<p>1 Introduction to Guiding Development No comments as yet</p> <p>1 Housing Delivery Policies DM1 to DM15 – Housing Delivery No objections</p>
Included files	
Title	Housing Delivery
ID	EGS12146
Person ID	1160677
Full Name	Mr Paul Doughty
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ HOUS

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS12176
Person ID	1269448
Full Name	Mr John Mardell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	Too many 'affordable housing' proposed
Included files	
Title	Housing Delivery
ID	EGS12185
Person ID	399285
Full Name	Mr John Roberts
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – GRO BER
Housing Delivery comment	The plan to uplift densities - is totally wrong and misguided for Berkhamsted
Included files	
Title	Housing Delivery
ID	EGS12222
Person ID	1269475
Full Name	DR EMMA SHERRINGTON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	GRO GRBT
Housing Delivery comment	I am very well aware that we have a housing crisis in the UK. Young people are struggling to leave the parental home and earn enough to pay rent, let alone buy property. Homelessness is a disgrace in a developed, wealthy, democratic country and with the tsunami of unemployment, failed business and mental ill-health that will follow the COVID-19 pandemic, therefore the urgency of providing affordable housing is ever more pressing. Thus, I am pleased to see DBC proposing more housing development. I am very keen that the housing to be built should be of the sort that can provide young single people, couples and families with an affordable home. I hope that there will be plenty of provision of homes for those needing support to get back on their feet after challenging financial and health crises. The Local Plan does not need to be providing large, executive homes, whose only real benefactors are the Developers and their associates.

I understand that the calculations on how many new homes are needed in Dacorum are based on flawed evidence that has been fed into a discredited algorithm. I implore you to reexamine the proposed numbers of houses required.

However many houses need to be built and where they are to be built, it is imperative that they are built on the principles of "passivhaus", i.e. in the most sustainable way, so that overall the houses do not contribute further to global warming, environmental degradation and Climate Crisis. They need to have energy systems that utilise the least amount and potentially actually generate much of their own energy (solar, wind, geothermal), insulated to the highest standard and provide a healthy, airy, light filled space that generates wellbeing.

When building new homes, it must be remembered that these new houses will be filled with people who will need additional services, schools for their children, health care facilities that are local and appropriate for the attending population, better public transport links, open spaces to enjoy nature and promote good health and wellbeing. The current Local Plan seems to be very thin on detail about these issues. Currently, Berkhamsted has less than the recommended public green space, and in the last year we have lost even more due to the totally misguided attempt to turn the Moore into a carpark. DBC have a history of ignoring their citizens when it comes to protecting the environment. I hope DBC are listening now.

Has DBC explored all the possible Brownfield site development available in the area before it starts carving up the Green Belt? Once ancient trees, hedgerows, wildflower meadows and floodplains are grubbed up and built over, they are lost forever. These are the important carbon sinks that we need to help mitigate against increasing greenhouse gas emissions and vital habitat for our ever shrinking biodiversity. Please, please, please put protecting the environment at the heart of any decision. Where I live on the boundary between Berkhamsted and the parish of Northchurch, there are many areas of woodland and hedgerows e.g. Bell Lane, which currently are under threat from the developers bulldozer if the Local Plan goes ahead. Grubbing these up and then planting a few non-native shrubs like they have already done on Shootersway for the Bearoc development does irreparable damage.

With this massive increase in housing will come an equally huge increase in traffic. DBC needs to do everything in their power to limit a dangerous level of air pollution that have been proven to be responsible for large scale premature deaths. Much, much better public transport links need to be put into place, more cycling routes need to be constructed and a much faster transition to electrification of both personal and commercial vehicles needs to be promoted. DBC needs to be much more proactive in putting in electrical charging infrastructure that is fit for purpose i.e. rapid 50+ kW charges in prominent places around the borough, car parks, bus depots, etc. In addition, DBC needs to be looking at electrifying their own fleet of vehicles (Buses, cars, vans and refuse vehicles) to meet global targets for CO2 reduction.

In conclusion:

- Are the number of houses needed correct for 2020-2038 for Dacorum Borough Council? Are you using the most accurate and up-to-date evidence and is the calculation being used appropriate?
- Are you making best use of the land available?
- Will the proposed housing actually address the housing shortage crisis? If so, will the homes be affordable and fit for purpose?
- If you build new housing, will they be built on the best practice sustainable principles? Will you prevent habitat destruction and limit global warming and air pollution?
- Has the level of infrastructure to support this enormous increase in Dacorum's population been addressed sufficiently in the Local Plan?

Please listen and properly consult the residents of Dacorum. This is our home you are proposing to change irrevocably.

Included files

Title

Housing Delivery

ID

EGS12236

Person ID

1269478

Full Name

NIGEL TAYLOR

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

Yes

* Yes

* No

Officer Comment

OBSV HOUS

Housing Delivery comment

1 Their needs to be a better split between 1) houses for social rent, 2) Houses for sale at prices affordable on local wages and 3) houses built for the open market. The total target in each town should be split equally between these 3 categories.

Included files

Title

Housing Delivery

ID	EGS12241
Person ID	1269479
Full Name	BARBARA HARVEY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS12253
Person ID	1227654
Full Name	Mrs Margaret Warman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	1 <u>OBJ</u>
Housing Delivery comment	<p>Proposed Housing for Older People</p> <p>According to SW Herts Local Housing Needs there is projected to be a 45% increase in population over the age of 65 up to 2036. One of the arguments put forward for such a large increase in housing in the Borough is "your children will need somewhere to live if they do not want to have to move out of the area." What if older parents do not want to move out of the area? Older people often want to downsize to a more manageable freehold property. Your own report says that 85% of those aged over 65 in SW Herts are living in under-occupied property. There are many four-bedroom family houses which are occupied by only one or two people. Again, your own report says "If this stock could be used more efficiently then the amount of land required for additional housing could be reduced."</p> <p>Existing bungalows are allowed to have first floors added, thus reducing the supply, which pushes up the price. There is a detached two-bedroom bungalow for sale in Tring at an asking price of £700,000! Yet the only recommendation for older people's housing in the Plan is for rented or leasehold, with care or support. Older people do not want to go from a four-bedroom family home to a tiny flat with a minder! There has to be something in between - and this is where Planning comes in. Do not let developers build more four-bedroom houses just because they want to. Do not give permission for endless "retirement flats" that have expensive service charges. Churchill have been trying to sell Sheldon Lodge retirement flats in Berkhamsted for six and a half years - which shows how unpopular they are.</p>
Included files	
Title	Housing Delivery
ID	EGS12276
Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Officer Comment	OBSV
Housing Delivery comment	? The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments. once the plans have been approved and they are either scrapped or scaled down.
Included files	
Title	Housing Delivery
ID	EGS12285
Person ID	1269485
Full Name	NICOLA HULSE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBSV
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery

ID	EGS12317
Person ID	1264637
Full Name	Ollie Parrish
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS12321
Person ID	1269489
Full Name	STEVE HILL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS12359
Person ID	1269491
Full Name	Mr David Eeley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – GFRA HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS12365
Person ID	1269492

Full Name	Mrs Isabelle Gorton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS12382
Person ID	1164091
Full Name	R.J. Hollis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<u>OBJ BER</u>

Housing Delivery comment	<p>The housing policy hopes for 40% affordable housing. In my experience this is just a wishful figure which developers quickly reduce before the construction stage. Also the word affordable is a misnomer. People on the average wage would be hard put to buy an affordably priced home in Berkhamsted. I'm sure the plan producers know this better than me; however Berkhamsted does need housing for young people so the guiding policy should have firmer plans as to how this will be met, ideally social housing or at least housing associations with options.</p> <p>I missed any policy on social housing. A couple of excellent developments on brown field sites in Berkhamsted have been done in recent years, this should be expanded and be part of the plan.</p>
Included files	
Title	Housing Delivery
ID	EGS12400
Person ID	1269497
Full Name	MICHAEL RUDIN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV
Housing Delivery comment	<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>
Included files	

Title	Housing Delivery
ID	EGS12434
Person ID	1146040
Full Name	Mrs Rachel Macdonald
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ NOC
Housing Delivery comment	<p>Housing Delivery: Affordable Housing</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>
Included files	
Title	Housing Delivery
ID	EGS12459
Person ID	498378
Full Name	Mr Paul Dunham
Organisation Details	Clerk to the Council Kings Langley Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Officer Comment	OBJ – GRO
Housing Delivery comment	<p>Kings Langley Parish Council 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> <p>Nevertheless, failure to meet the Government’s targets will mean Dacorum is penalised under the Housing Delivery Test for <i>housebuilders’ failures</i> to build enough homes, by being forced to release more Green Belt land for development. The more developers miss the Council’s housing target, the more land Dacorum will be forced to release for development. A lower, more realistic target is far more likely to be achieved and consequently negate any demand to release further Green Belt land in the Borough. However, developers should be equally concerned that forcing the Borough to release more land for development will have a long-term, negative impact on their relations with the Council, which all parties should be keen to avoid.</p>
Included files	
Title	Housing Delivery
ID	EGS12461
Person ID	498378
Full Name	Mr Paul Dunham
Organisation Details	Clerk to the Council Kings Langley Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	

Officer Comment	OBJ - GRO
Housing Delivery comment	If unrealistically high local housing targets are intended to increase the supply of housing for young people, the question needs to be asked as to how inflated house prices on Green Belt sites will help achieve this? The answer is clearly it will not. Similarly, what chance have Dacorum of meeting the commitment made at their Council meeting in January 2021 “to build on the positive work of previous years and continue work directly to develop homes for social rent and to seek further opportunities with partner registered providers to accelerate the delivery of new social rent homes”. Developers will clearly be unwilling to increase the proportion of social rent housing on land where they have been obliged to pay a premium.
Included files	
Title	Housing Delivery
ID	EGS12465
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	
Officer Comment	NOC
Housing Delivery comment	<p><u>Dacorum Local Plan Emerging Strategy for Growth 2020-2038 Regulation 18 – November 2020 Consultation</u></p> <p>Thank you for consulting St Albans City and District Council (SADC) on your ‘Dacorum Local Plan Emerging Strategy for Growth 2020-2038 Regulation 18’ (November 2020).</p> <p>SADC wishes Dacorum Borough Council (DBC) the best of luck in preparing the Plan. We look forward to continuing productive Duty to Cooperate (DtC) work between Local Planning Authorities (LPAs).</p> <p>1 General Comments</p> <p>Overall, SADC is generally supportive of the DBC Reg 18 Local Plan at this stage. The detailed comments provided below relate primarily to how SADC’s Local Plan position is reflected. SADC hopes these are useful in preparing for the next stages in DBC’s Local Plan development.</p>

2 SADC Local Plan Update

SADC withdrew our submitted draft Local Plan on 23 November 2020 and has recently embarked on a new draft Local Plan. This is currently at very early stages in its production and no decisions have yet been taken on the content of the new draft Local Plan. Some of the evidence base is also being updated. We are seeking to move forward as quickly as reasonably possible with our new draft Local Plan. We look forward to working with you to assist DBC in accurately reflecting SADC's Local Plan position in your own Plan, as you update it, in due course.

3. Housing Need

SADC generally welcome the approach that DBC's Local Plan is taking to housing need, especially the Local Plan's objective "*to deliver the identified housing requirement between 2020 and 2038*". We take this to mean that you will be specifically meeting this within your administrative boundary and to include all affordable housing delivery. To reiterate as discussed in the recent Portfolio Holder meeting, as we have also done to Watford Borough Council, SADC does not currently consider that it has any capacity to support DBC in meeting its housing need.

With this in mind, SADC have some current concerns with the approach, which are set out below.

Firstly, SADC is also pleased to see that our previous concerns at November 2017 Regulation 18 'Issues and Options' regarding the application of the standard methodology appear to have been taken on board. However, DBC housing numbers will need to be updated in line with the Government's response to the 'Changes to the current planning system' consultation. DBC housing numbers are not now 922 but rather 1,023 per annum as per the updated standard method.

Secondly, we note, although not explicitly stated in the Local Plan, that DBC are proposing a stepped housing trajectory. We consider that this needs further clarification and justification as required by the PPG. This is especially important given the standard method number will need to be amended to 1,023.

Included files

Title	Housing Delivery
ID	EGS12468
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	
Officer Comment	NOC
Housing Delivery comment	Finally, please can you confirm that you are meeting your affordable housing need in full within your own administrative boundary, including your social rented housing need. We are currently unclear from the Local Plan text and your Housing Topic paper text whether or not DBC is intending to meet all types of affordable housing need in full.
Included files	
Title	Housing Delivery
ID	EGS12506
Person ID	1269527
Full Name	JULIAN SMITH
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS12607

Person ID	1269554
Full Name	Ellen Satchwell
Organisation Details	Sustainable Development Lead Advisor - Thames Solent Team Natural England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	NOC
Housing Delivery comment	Sites of Least Environmental Value In accordance with the paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.
Included files	
Title	Housing Delivery
ID	EGS12668
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

<p>Yes / No * Yes * No</p>	
<p>Officer Comment</p>	<p>OBJ OPEN LAND, OSSSL, HOUS</p>
<p>Housing Delivery comment</p>	<p>My client is the owner of Edgeworth House and the associated private garden to the rear of the property (“the site”), which equates to approximately 1.6ha in size. Edgeworth House is a Grade II* Listed building and the site comprises associated ancillary buildings which are also located adjacent to the High Street along the site’s southern boundary. The site has a very good frontage onto the High Street with three existing access points. A section of the River Bulbourne crosses through the site and the northern boundary abuts the Grand Union Canal. There is no public access to the site and historically there has never been public access to the site. The site is fully enclosed with hedges and fences on all sides.</p> <p>To the west of the site are existing 2-storey residential properties of Bulbourne Close and Valley Road where the River Bulbourne is culverted under the road. Opposite the site frontage along the High Street to the south are 2-storey residential properties and to the east of the site are 3-storey apartment blocks of Turner Court and a builders’ merchants further to the north on the Sarthe Business Park.</p> <p>My client made previous representations (objection) to the Council in respect of the Site Allocations Development Plan Document (DPD) that was adopted in July 2017.</p> <p>In summary, the site is identified as an Open Land designation on the Policies Map of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. My client strongly objects to the identification of the site as an Open Land designation in the Emerging Strategy for Growth for reasons set out further below. My client requests 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 this consultation. The site can contribute towards the Borough’s housing needs through a windfall housing site; the Open Land designation must therefore be omitted.</p> <p>My client considers the Council is not sufficiently following the NPPF, in particularly paragraph 68 which encourages strategic policy-making authorities to identify small and medium sized sites that can make an important contribution to meeting the housing requirement of an area, including the identification of land to accommodate at least 10% of their housing on sites no larger than one hectare; and supporting the development of windfall sites, giving weight to the benefits of using suitable sites within existing settlement for homes. Edgeworth House would be a suitable housing site in this regard.</p> <p>The Edgeworth House site is also well served by public transport again a priority in the NPPF, in particularly chapter 9 which seeks to promote sustainable transport and paragraph 108 which seeks to ensure appropriate opportunities to promote sustainable transport modes can be taken up, in assessing sites that may be allocated for development.</p> <p><u>Minimum Housing Need and Future Methodology Changes</u></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.

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.

Included files	
Title	Housing Delivery
ID	EGS12790
Person ID	1269630
Full Name	Christopher Lyne
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Officer Comment	OBJ GRO
Housing Delivery comment	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.
Included files	
Title	Housing Delivery
ID	EGS12827
Person ID	1144631
Full Name	Mrs Ann Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – GRO - HOU OBJ – HOUS - GRBT
Housing Delivery comment	<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>

Nevertheless, failure to meet the Government’s targets will mean Dacorum is penalised under the Housing Delivery Test for *housebuilders’ failures* to build enough homes, by being forced to release more Green Belt land for development. The more developers miss the Council’s housing target, the more land Dacorum will be forced to release for development. A lower, more realistic target is far more likely to be achieved and consequently negate any demand to release further Green Belt land in the Borough. However, developers should be equally concerned that forcing the Borough to release more land for development will have a long-term, negative impact on their relations with the Council, which all parties should be keen to avoid.

The Borough’s current reliance on Green Belt development to achieve its targets also runs counter to the Government’s response to the local housing need proposals set out on 16th December 2020 in which it stated “... *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 Campaign for Rural England (CPRE) have also consistently pointed out that housing developments on Green Belt are invariably too expensive for those looking for a first home and do nothing to address the needs of younger people and families trying to put a roof over their heads.

As a result, Green Belt development will do nothing to address the Borough’s housing needs. It will also undermine one of the aims of the latest version of the Kings Langley draft Neighbourhood Plan (January 2021), namely “Providing homes in the parish that are financially accessible to younger people, especially young families and those stepping onto the property ladder for the first time”.

If unrealistically high local housing targets are intended to increase the supply of housing for young people, the question needs to be asked as to how inflated house prices on Green Belt sites will help achieve this? The answer is clearly it will not. Similarly, what chance have Dacorum of meeting the commitment made at their Council meeting in January 2021 “to build on the positive work of previous years and continue work directly to develop homes for social rent and to seek further opportunities with partner registered providers to accelerate the delivery of new social rent homes”. Developers will clearly be unwilling to increase the proportion of social rent housing on land where they have been obliged to pay a premium.

Included files

Title Housing Delivery

ID EGS12842

Person ID 1145801

Full Name Mr Guy Barlow

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ NOC
Housing Delivery comment	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.
Included files	
Title	Housing Delivery
ID	EGS12876
Person ID	1207443
Full Name	Mrs Jennifer Bissmire
Organisation Details	Clerk Markyate Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	NOC
Housing Delivery comment	Referring again to the joint representation from the Town & Parish Councils on the fundamental flaw in the Local plan in that the housing need is not supported with the latest information, the delivery of new housing in Markyate is not necessary or desirable as most of the proposed development is on Green Belt land while other proposed sites are not compatible with the sustainability policies. Ref 14 Housing Delivery Ref 14.1. As a general principle this looks appropriate, but there should always be room for site specific provisions.

Ref 14.41 The Parish Council agrees that homes should be provided to enable people in housing need to remain in their local village. Ref Policy DM3 - Rural Exceptions includes:

Development will be permitted only if it meets an identified local need for affordable housing, preference is given to offering the housing to people who have a local connection with the village or parish, through work, residence or family. The Parish Council support this policy.

Ref Policy DM5 Conversions and changes of use to housing should include requirements for access to sufficient out door amenity space, provision of internal living space in accordance with Policy DM12-Nationally Described Space Standards, be adequately insulated to limit the transmission of noise and have well landscaped parking.

Ref Policy DM6

Ref 14.55 Residential Annexes need to be carefully controlled in terms of car parking, amenity space, and their impact on neighbouring properties, occupiers and the locality. Ref 14.56 The Local Plan may require that an annexe is occupied for purposes ancillary to the residential use of the host dwelling

The Parish Council support these aspects of Policies DM5 and DM6; conversions and annexes can create problems in a tightly packed community. It would help if loft conversions were specifically mentioned too as similar issues occur.

Housing for Older People

Ref 14.62 The South West Hertfordshire Local Housing Needs Assessment has lead to the conclusion there is no need to directly plan for this type of accommodation within the Dacorum Local Plan.

This is a generalisation for the Borough, but local needs are LOCAL. The need for specialist accommodation for older people needs reviewing for each community. It may well be that Markyate does not need more specialist housing for older people, although the lack of any permanent support in the village is disappointing. There has been a long-standing requirement for a residential care home in Markyate which has yet to be met. The Local Plan makes no reference to the need for or provision of Residential Care Homes. The Parish Council would like this omission remedied.

Density of Development Ref 14.69

Ref Policy DM11 Markyate Parish Council is opposing any development in the village, but where 'windfall' opportunities might occur, we would agree that development should only be permitted if

- 1 The character of the area;
- 2 Residential amenity;
- 3 highway safety;
- 4 heritage assets;
- 5 townscape

Are not adversely affected.

Included files

Title

Housing Delivery

ID	EGS12936
Person ID	1269678
Full Name	GARY TRENT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS INFR EMPL
Housing Delivery comment	A minimum of 35% affordable housing makes a mockery of the development. The other 65% is therefore not needed. The proposal states that modelling points to a greater need for smaller 1 and 2-bedroom affordable homes and larger (3+bedroom) homes, mainly houses in the market sector. I have worked in residential housing, both privately and in government for over 30 years and never once have I seen affordable housing delivered in an otherwise expensive area - the nature of the market means that when you develop housing, whatever it is, in an expensive area, it will take on the inherent value of the location. In fact, as new build, it will achieve a premium, especially in a New Town like Hemel Hempstead where there is a high proportion of commission/ex-council stock. And if you support that additional new housing with good infrastructure and employment, you simply increase demand faster than you can meet it. And prices increase accordingly. The strategy is flawed unless ALL of the additional development is truly affordable social housing.
Included files	
Title	Housing Delivery
ID	EGS12992
Person ID	1269778
Full Name	STEPHEN BLADEN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	OBSV – GRO
Housing Delivery comment	A revised Local Plan must include a substantially reduced number of new houses. It should also enforce the 40% minimum affordable homes objective across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
Included files	
Title	Housing Delivery
ID	EGS13006
Person ID	330928
Full Name	Mr James Gregory
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
Officer Comment	OBJ – GRO BER HOUS CLI
Housing Delivery comment	<p>The population and housing projections are based upon out of date, incorrect and inflated statistics for this area when compared to the rest of the country.</p> <p>Goal of affordable housing in Berkhamsted does not stand scrutiny since the base price of a dwelling will be up to 60% higher than the national average.</p> <p>Many policies are missing or have not been applied e.g. climate, zero net carbon. Where are the 'building a community' guidelines and where are the developers guarantees of sustainable living policies listed and applied?</p>
Included files	
Title	Housing Delivery
ID	EGS13015

Person ID	1164731
Full Name	Deborah Turnbull
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	<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>
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS13048
Person ID	1270013
Full Name	Mr Daniel Ritchie

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ - HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS13082
Person ID	1270031
Full Name	STUART GARNETT
Organisation Details	INSPIRED VILLAGES
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ

Housing Delivery comment

I write on behalf of Inspired Villages, majority owned and fully funded by Legal & General. We are operators of retirement communities (Use Class C2) within the UK. With 6 operating villages and a further 14 legally secured – consented, in planning or under construction.

Attached is our representation to the Local Plan which includes recommendations that your plan should incorporate. Specifically, Policy DM2.1.d. mentions specialist housing for older people (C2 or C3) as being liable for affordable housing. Para 14.36 acknowledges a lower contribution should apply. However, no percentage is set – instead it makes reference to a future Affordable Housing SPD. This is unjustified and not sound. How can the retirement community sector proceed with confidence in acquiring sites when it has no idea of what the affordable housing percentage should be. If you were to apply such an approach to normal residential housing (C3 use class) this would be found unsound. This is not a level playing field and Policy DM2 should expressly reference a target percentage based on your evidence base.

In doing so, your evidence base must acknowledge the different typologies of specialist housing based on the PPG – age-restricted general market housing, retirement housing, retirement communities, and care homes. They are different and have their own requirements. Retirement communities are typically of a greater scale – normally in excess of 100-150 homes (an Inspired village is usually at least 150 units); has a significant amount of communal space for on-site facilities (an Inspired village can have as much as 25% of its GIA as ‘non saleable space’ all of which affects viability). We expect your consultants to fully model each typology of specialist housing to conclude effectively on an appropriate viability position. It is our experience that due to the significant up-front costs of our type of development; the level of non-saleable space; staffing and funding it is normally unviable to deliver on-site affordable housing.

Policy DM9 – we welcome a policy for ‘housing for older people’ and indicative figures for some of the different typologies. However, we question the disaggregation of rented and leasehold extra care housing indicative figures. There is an increasing rise in provision of rented, however, the predominant tenure is leasehold. We recommend that the two figures are combined to support the delivery of extra care housing to provide flexibility for prospective residents. For example, an Inspired village is predominantly occupied by leaseholders, though there is an increase in the number of renters, however, we do not ringfence any unit for leasehold or rented – it will be determined by the market.

Policy DM9(2) says the site allocations will set out specific requirements for the inclusion of ‘an element of housing for older people’. I have reviewed these allocations and there is nothing in there which would compel the landowner / promoter / developer of those sites to bring forward specialist housing on those sites. Due to the circumstances in my comments to Policy DM2 above, retirement community operators are at a disadvantage to residential housebuilders in bidding for sites. Therefore, unless your policies are more prescriptive to require specialist housing on these sites then it is very unlikely nothing will be delivered on those sites.

In conclusion:

1. Policy DM2 and its evidence base must fully assess the different typologies of specialist housing and DM2 must express a target affordable housing percentage for extra care (and other types of specialist housing).
2. Policy DM9 should combine the indicative figures for leasehold and rented extra care housing to provide flexibility.
3. Policy DM9(2) and the strategic sites should be reviewed to seek to ensure some or all of the sites will deliver specialist housing (retirement housing and/or retirement communities and/or care homes) and the wording must expressly acknowledge this.
4. The 8 recommendations set out in the accompanying document should be assessed and incorporated into the plan.

I trust that the above is acceptable and we look forward to receiving a confirmation from you of the safe receipt of these representations.

Included files	ATTACHMENT TO COMMENT EGS13082.pdf
Title	Housing Delivery
ID	EGS13098
Person ID	1270037
Full Name	MRS GINA BARLOW
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	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.
Included files	
Title	Housing Delivery
ID	EGS13114
Person ID	1264860
Full Name	Alan Coughtrey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	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.
Included files	
Title	Housing Delivery
ID	EGS13130
Person ID	1270061
Full Name	Mrs Coughtrey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	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.
Included files	
Title	Housing Delivery
ID	EGS13158
Person ID	1270068
Full Name	Ms Francesca Greenoak
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV
Housing Delivery comment	I feel strongly that Affordable Housing and Self Build should be a priority and the proposals made more strongly and in more detail. [Policy DM2 section 14.24 page 1]
Included files	
Title	Housing Delivery
ID	EGS13214
Person ID	1270128
Full Name	Richard Salway
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ NOC
Housing Delivery comment	Housing Delivery: 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. 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.
Included files	

Title	Housing Delivery
ID	EGS13230
Person ID	1270134
Full Name	Mrs Louise Bladen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV - GRO
Housing Delivery comment	A revised Local Plan must include a substantially reduced number of new houses. It should also enforce the 40% minimum affordable homes objective across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
Included files	
Title	Housing Delivery
ID	EGS13247
Person ID	1270143
Full Name	Mr Thomas Parsons
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV

Housing Delivery comment	<ul style="list-style-type: none"> The 40% minimum affordable homes objective should be enforced across the Too often developers in the past have been allowed to waive their affordable homes commitments.
Included files	
Title	Housing Delivery
ID	EGS13256
Person ID	1270148
Full Name	Mr Carl Blackwell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS13327
Person ID	1270200

Full Name	Mr Richard Harman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV – BRAG HOUS
Housing Delivery comment	(14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS13366
Person ID	924129
Full Name	Mrs Natalia McIntosh
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV – TRI BER
Housing Delivery comment	(14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Tring and Berkhamsted, which makes the Council's strategy even more questionable.
Included files	

Title	Housing Delivery
ID	EGS13393
Person ID	1153922
Full Name	Roger Hyslop
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	<u>OBSV BER</u>
Housing Delivery comment	(14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.
Included files	
Title	Housing Delivery
ID	EGS13414
Person ID	1270229
Full Name	Homes England
Organisation Details	
Agent ID	1270231
Agent Name	Ms Rebecca Dewey
Agent Organisation	Associate Director WSP
Yes / No * Yes	

* No	
Officer Comment	OBJ DM8
Housing Delivery comment	DM8 – Custom and Self Build Housing 35b) Justified – No supporting evidence published to show the consideration of the implications of custom and self-build plots on the achievable densities and capacities of allocated Growth Areas.
Included files	
Title	Housing Delivery
ID	EGS13415
Person ID	1270229
Full Name	Homes England
Organisation Details	
Agent ID	1270231
Agent Name	Ms Rebecca

	Dewey
Agent Organisation	Associate Director WSP
Yes / No * Yes * No	
Officer Comment	OBJ DM8
Housing Delivery comment	<p>CHANGES TO LOCAL PLAN</p> <p>2. On housing developments with 40 or more new houses, 5% of the house plots should be made available on site as serviced building plots to enable the delivery of self and custom build properties. Where these sites form an allocated Growth Area, the site's masterplan should show where the provision of self and custom build plots are achievable and deliverable, for the specific site. The provision will take account of the viability of the development.</p> <p>The amendment to the wording of Policy DM8 supports the provision of self and custom build property, whilst ensuring that the Borough's Growth Areas have a mechanism to protect the quality and capacity of their housing scheme. The provision of a masterplan is required for the development of Growth Areas providing a mechanism to identify and assess possible custom and self-build plots.</p>
Included files	

Title	Housing Delivery
ID	EGS13440
Person ID	1270264
Full Name	MRS JANE BROWN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV GRBT EV
Housing Delivery comment	Policy DM5 proposes that houses may be converted to flats and non-residential properties to housing. This will presumably reduce the need for new homes to be built on Green Belt elsewhere in the Borough. More evidence is needed as the extent to which this policy will be applied.
Included files	
Title	Housing Delivery
ID	EGS13444
Person ID	1270263
Full Name	MRS SHARON O'SULLIVAN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV

Housing Delivery comment	Section14 Housing Delivery Policy DM1 requires a mix of housing types, sizes etc. Home working or live/work provisions should be included along with the other specialist types of new housing.
Included files	
Title	Housing Delivery
ID	EGS13473
Person ID	1270266
Full Name	VANDA EMERY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV PDL AHST RETL
Housing Delivery 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
Included files	
Title	Housing Delivery
ID	EGS13512
Person ID	1270285
Full Name	MARTIN WELLER
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS13544
Person ID	1260521
Full Name	Steve Ritchie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	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.

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.

Included files

Title Housing Delivery

ID EGS13578

Person ID 1227768

Full Name Ms Denise Young

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBSV

Housing Delivery comment

- The 40% minimum affordable homes objective should be enforced across the Too often developers in the past have been allowed to waive their affordable homes commitments.

Included files

Title Housing Delivery

ID EGS13638

Person ID 1270343

Full Name KEITH DELDERFIELD

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

Yes

* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS13673
Person ID	1207133
Full Name	Chilterns Conservation Board
Organisation Details	Chilterns Conservation Board
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ COU LAND PWCG
Housing Delivery comment	<p>DM1 Mix of Housing Object.</p> <p>The CCB is concerned that the policy, particularly clauses 3 and 4a, will fail to address the issue of there being a relative lack of smaller homes in rural locations. The tendency, particularly in recent years, has been for residential development on small sites in villages, and for isolated dwellings in the countryside, to provide for high-end market demand; only rural exceptions sites seem to provide smaller homes, and those are usually for affordable rented properties. Many housing needs in smaller rural communities, which arise from newly forming households, or from older residents seeking to downsize, could be met by the provision of a small number of smaller (1-2 bedroom) homes on the sorts of infill plots that frequently provide a single detached executive home. We consider that this policy should express a preference for</p>

a higher proportion of small market homes on sites where housing development is acceptable in principle, including in the AONB and its setting.

Included files

Title Housing Delivery

ID EGS13674

Person ID 1207133

Full Name Chilterns Conservation Board

Organisation Details Chilterns Conservation Board

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment SUP HOUS

Housing Delivery comment

DM2, DM3, DM4 Affordable and agricultural workers' housing Support.

The CCB strongly supports the three policies relating to affordable, rural exceptions and agricultural workers' dwellings. These policies are essential for creating and maintaining homes that people who need to live in the countryside (including the AONB) can afford to live in.

As an observation, we find that clause 3 of policy DM3, relating to entry-level exceptions sites, is unclear. We understand that this is intended to restrict such proposals to Long Marston and Wilstone. If this is the case, then the reference to the "Rural Area" is superfluous, and gives the impression that proposals in other parts of the Rural Area would be acceptable, including those in the AONB, where the NPPF's entry-level exceptions sites policy should not apply. We recommend deleting the reference to the Rural Area. (See also our objection to the Rural Area policy SP12.)

Included files

Title Housing Delivery

ID EGS13675

Person ID 1207133

Full Name Chilterns Conservation Board

Organisation Details	Chilterns Conservation Board
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ LAND
Housing Delivery comment	<p>DM5 Conversions and changes of use to housing Object.</p> <p>The CCB would welcome a reference in this policy to encourage redevelopment rather than conversion in circumstances where the existing building is considered not to conform with the identified character of an area. We propose a third clause as follows:</p> <p>“3. While a conversion is often the most straightforward form of development, an efficient use of energy and materials, especially with regard to buildings of historic or architectural merit, where the existing building is of design or constructed from materials not consistent with the general identified character of the area, a more sensitive redevelopment would be supported. This would particularly apply in the Chilterns AONB and its setting.”</p> <p>We would also welcome a reference to the Chilterns Buildings Design Guide as part of the “supporting guidance” section.</p> <p>The policy may better be divided into two, one relating to sub-division of existing residential properties and one to conversion of other uses to residential, as the considerations applying to each are different.</p>
Included files	
Title	Housing Delivery
ID	EGS13710
Person ID	1263002
Full Name	Rhona Denness
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Officer Comment	OBSV – GFRA HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS13725
Person ID	223941
Full Name	Mrs Cathy Davidson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	<p>The proposed Policy OM S, 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>

Included files	
Title	Housing Delivery
ID	EGS13795
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV
Housing Delivery comment	? The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
Included files	
Title	Housing Delivery
ID	EGS13803
Person ID	1163978
Full Name	John Wignall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	<u>OBSV</u>

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS13835
Person ID	777073
Full Name	Mrs Anne Lyne
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ – GRO
Housing Delivery comment	<p>It is acknowledged by all that the latest algorithms used by the Government, introduced to iron out anomalies elsewhere, have had the unfortunate effect in Dacorum's case of imposing even higher housing targets than the previous ones, which were already demonstrably too high. The actual need according to ONS is shown at 355 per annum, not 1,023, nor even the previous 922. Development to this level simply is not sustainable in the Borough for many reasons and will be developer-driven, still failing to provide the much-needed housing at an accessible price for local people. Dacorum does not need vast numbers of large executive homes for people moving out of London. Local people need the right places to live. Provision of the extra housing is unlikely to bring local house prices down.</p>
Included files	
Title	Housing Delivery

ID	EGS13876
Person ID	1270388
Full Name	Mr & Mrs David & Emma Robertson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ HOUS GFRA
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS13893
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ NOC
Housing Delivery comment	<p>Housing Delivery: Affordable Housing</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>
Included files	
Title	Housing Delivery
ID	EGS13912
Person ID	1207810
Full Name	Louisa Groves
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ GRO HH08
Housing Delivery comment	<p>Housing Delivery - simply put the housing growth proposal is too high. We do not require 16,600 new homes in Dacorum. Most of the housing proposed are blocks of flats. Residents specifically informed Dacorum Borough Council that they did not want anymore than 4 storey buildings at Hemel Hempstead Station. This has been ignored.</p>
Included files	
Title	Housing Delivery
ID	EGS13982

Person ID	1270411
Full Name	Ms Jacqui Parr
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV
Housing Delivery comment	<ul style="list-style-type: none"> The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
Included files	
Title	Housing Delivery
ID	EGS13995
Person ID	1270412
Full Name	James Mullins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – BER - HOUS
Housing Delivery comment	(14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Berkhamsted, which makes the Council's strategy even more questionable.

Included files	
Title	Housing Delivery
ID	EGS14012
Person ID	1146072
Full Name	Helen Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ COVID HOUS TRI
Housing Delivery comment	<p>Affordable housing propped is inadequate. Affordable housing defined as 80% of average market value is out of reach for many since we live in a very costly area. Plans should include social housing for which demand currently massively outstrips supply, particularly since some of the land to be built on (e.g. Dunsley farm Tring) is currently council owned. The effects of Covid 19 on people's finances will be felt for many years to come and this should be taken into account.</p> <p>In terms of mix of housing the provision for the elderly is inadequate. Many do not want to live in leasehold properties with expensive management fees. Many older people would like to live in a small freehold single story property with good access to the town centre. This appears to be a total omission from the plan. Proposed provision for the elderly seems to be focused entirely on leasehold and rented properties which is not what older people wish to buy.</p> <p>I disagree with proposed increases to building density in Tring. The pandemic has made people value their garden spaces more and this is not how people will wish to live. With anticipated increases in home working in the future people will require densities to be maintained at current levels, or even reduced.</p>
Included files	
Title	Housing Delivery
ID	EGS14049
Person ID	1264962

Full Name	Courtney Culverhouse
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV - DACGP
Housing Delivery comment	I would also like the Green Party recommendations to be listened to: Housing Delivery: Affordable Housing - The rent or level of mortgage repayment to be no more than athird of the household income (calculated on the income of worked in Dacorum).
Included files	
Title	Housing Delivery
ID	EGS14098
Person ID	1270485
Full Name	Mr Colin Poole
Organisation Details	
Agent ID	1261397
Agent Name	Chloe French
Agent Organisation	Planning Associate Bidwells LLP
Yes / No * Yes * No	
Officer Comment	OBJ HOUS PWCG

Housing Delivery comment

Delivery of Self and Custom Builds (SCB)

The key requirements of the national legislation governing self and custom builds (SCB) are set out in the Self-Build and Custom Housebuilding Act 2015 as amended by the Housing and Planning Act 2016. The Acts introduced three duties for local authorities to meet demand for custom and self build housing (collectively known as “the Right to Build”), requiring them to:

- Prepare, publicise and maintain a register of individuals and associations of individuals “who are seeking to acquire serviced plots of land”;
- Have regard to the register “when carrying out their planning, housing, land disposal and regeneration functions”; and,
- Give suitable development permission for enough serviced plots of land to meet the demand for custom and self-build housing in their area on a rolling, three-year, basis.

The Governments’ White Paper ‘Fixing our Broken Housing Market’ also gives support for SCB. This led to the Right to Build Task Force, which recognise the latent market for housing delivery within the SCB market, but also identifies that high quality, sustainable dwellings can be delivered through allowing and supporting SCBs.

On the 8 February 2021, the Planning Practice Guidance was amended to state that LPAs need to consider self build registers when they are preparing planning policies (Paragraph: 027 Reference ID: 57-027-201760728). Furthermore, it now states:

“Assessment of local housing need as a whole should be conducted using the standard method in national planning guidance. Within this context, the size, type and tenure of housing needed for different groups should be assessed including people wishing to self-build or custom-build their own homes.

Local planning authorities should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources (as outlined in the housing and economic development needs guidance), to understand and consider future need for this type of housing in their area. Secondary sources can include data from building plot search websites, enquiries for building plots recorded by local estate agents and surveys of local residents. Demand assessment tools can also be utilised.” Planning Practice Guidance (011 Reference ID: 57-011-20210208)

The Custom and Self Build, Demand Assessment Framework (January 2020), prepared by Three Dragons provides a simple comparison between demand for CSB (as measured by the register) and supply which is measured by single dwelling completions. A demand from the register for 29 plots a year has been identified and there is a current supply of 30 units per annum. This form of measurement is inaccurate and fails to fully recognise the demand for self and custom build pots. We therefore welcome the modelling undertaken by Three Dragons¹ which demonstrates that the demand for CSB plots will rise from 68 units per year in years 1 -5 to 78 units per year in years 11 – 17. The Local Plan should be planning for the full, quantifiable demand, and appropriate sites should be identified and brought forward through the Local Plan to meet this housing need, particularly in the later years of the Plan where it has been shown that the level of demand will increase.

We very much welcome the inclusion of Policy DM8 ‘Custom and Self Build Housing’ however strongly disagree that CSB plots should only be provided within larger development sites. Smaller sites are ideally placed to deliver CSB plots

and help develop communities of like-minded individuals while ensuring Government targets are met in a sustainable and well thought out manor. This is confirmed by the Three Dragons research which indicates that most of the demand is being met through small site developments. Specific, smaller scale plots should therefore be identified to address this requirement.

It is also important to note that Local Authorities have a rolling 3-year period in which to meet the needs of the register. The PPG states: “*At the end of each base period, relevant authorities have 3 years in which to permission an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period.*” (Paragraph: 024 Reference ID: 57-024- 201760728). Although there are currently 29 people on the register, the actual amount, as confirmed by Three Dragons, is more likely to be between 68 – 78 dpa. The current policy seeks to address SCB plot requirements through larger sites only. Once adopted, larger sites will then be required to plan in the SCB plots, this will inevitably take time to come to fruition and in the meantime, the rolling three-year target will not be met.

Summary and Conclusions

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.

Included files	
Title	Housing Delivery
ID	EGS14109
Person ID	1270501
Full Name	DAVID WHITE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ NCPC GRO HOUS EMPL RETL
Housing Delivery comment	

The Guiding Development policies fail to recognise the opportunities, presented by rapid changes to the economy, for dwellings to be built on Brownfield land. Deloitte's Global Consumer Tracker shows that close to 30% of consumers in the UK now shop online for food and non-food. According to the British Retail Consortium (BRC), sales of non-food items in physical shops have collapsed by 24%. These changes have led to record numbers of store closures. So, Brownfield sites, that were earmarked for office and retail use, are becoming available for housing. Use of brownfield sites would reduce the need to build on the Green belt, reduce the amount of urban decay and promote urban renewal. The Guiding Development Policies fail to capitalise on these opportunities.

Included files

Title Housing Delivery

ID EGS14171

Person ID 1270552

Full Name Mr Michael Friend

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ GRO HOUS COU LAND

Housing Delivery comment I strongly object to the council completely desecrating the countryside, listed as an area of natural beauty, by building three thousand dwellings at Long Marston. Spoiling the beautiful countryside for generations to come. Please rethink this

Included files

Title Housing Delivery

ID EGS14187

Person ID 1253654

Full Name Jodie Bell

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ – HOUS
Housing Delivery comment	<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>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>
Included files	
Title	Housing Delivery
ID	EGS14218
Person ID	1270581
Full Name	MR & MRS DUNCAN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14252
Person ID	1152075
Full Name	Rob Wakely
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ NOC
Housing Delivery comment	<p>Housing Delivery: Affordable Housing</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>

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.

Included files

Title Housing Delivery

ID EGS14282

Person ID 1270629

Full Name Rob Bray

Organisation Details Head of Sponsorship & Fundraising
Tring Rugby Club

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ HOUS TRI BER

Housing Delivery comment (14) Housing delivery. The council's intention to have 40% of new homes on sites of 10 or more homes as Affordable including homes to rent. This is a very tough challenge for developments around Tring and Berkhamsted, which makes the Council's strategy even more questionable.

Included files

Title Housing Delivery

ID EGS14302

Person ID 1259141

Full Name Kirsten Riemer

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Officer Comment	OBJ - HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14315
Person ID	1270635
Full Name	Catherine Bright
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – GFRA HOUS
Housing Delivery comment	<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>

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 Housing Delivery

ID EGS14320

Person ID 1270637

Full Name TOM GROVES

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ GRO

Housing Delivery comment Too many houses proposed - greater than the required need

Included files

Title Housing Delivery

ID EGS14417

Person ID 1270662

Full Name MAX GOODE

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Officer Comment	SUP HH08 HOUS URBD PWCG
Housing Delivery comment	<p>LCR and NR generally support the aims of draft Policy DM1 (Mix of Housing), however, considers that any proposed mix of units should also have consideration to the overall viability of a development. It is considered that this reference could be made clear within Part 5 of the draft policy.</p> <p>LCR and NR support the draft Policy DM2 (Affordable Housing), particularly the requirement for a judgement to be made on the overall provision of affordable housing on a site to be subject to <i>'the overall viability of the scheme and any abnormal costs'</i> (part 6(c)).</p> <p>LCR and NR support draft Policy DM11's (Density of Development) approach to specifying minimum residential densities and the appropriate locations for higher density development. Subject to the comments provided in response to Question 5 of these Representations on the overall capacity of draft allocation HH08, we support the draft Allocations setting specific residential delivery targets rather than a blanket approach taken on unallocated sites.</p>
Included files	
Title	Housing Delivery
ID	EGS14450
Person ID	1265051
Full Name	Edmund Knox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
Officer Comment	OBJ - HOUS
Housing Delivery 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 Housing Delivery

ID EGS14483

Person ID 1270672

Full Name ICP Asset Management Ltd

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBJ - HOUS

Housing Delivery comment

It is not necessary for the Local Plan to repeat National Policy and Guidance. The Section titled National Policy (para 14.2 through to 14.12), whilst useful at this stage, need not be carried through to the Regulation 19 Plan.

Policy DM2 – Affordable Housing is not suitably specific in regard to how much affordable housing should be provided in C2 and C3 age restricted housing (bullet 1d.) The Policy at bullet 1 a-c specifies the percentage required to be delivered. At bullet d, however, it just states that it will be expected but does not specify the percentage or financial contribution required.

Policy DM9 – Housing for Older People. Bullet 5 recognises the need for affordable housing provision with reference back to Policy DM2. As per our above comment, Policy DM2 does not actually set an affordable housing target for these uses.

Included files

Title Housing Delivery

ID EGS14493

Person ID 1270679

Full Name	GLENEDEN PLANT SALES LTD
Organisation Details	
Agent ID	1270678
Agent Name	MR WILLIAM LLOYD
Agent Organisation	DLP PLANNING LTD
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS PWCG
Housing Delivery comment	<p>Draft Policy DM1 – Mix of Housing</p> <p>Draft Policy DM1 ('Mix of Housing') refers to the requirement for developments of 10 or more homes to include “a mix of housing types and sizes to meet the needs of all sections of the community”, including “accommodation for older people”. These provisions are generally supported, but it is currently unclear how each of these forms of housing would be brought forward on development sites through draft Policy DM1. In particular, there does not appear to be a mechanism for ensuring delivery of sufficient residential or care home provision, as such accommodation cannot simply be delivered as a proportion of housing units.</p> <p>Draft Policy DM10 – Accessible and Adaptable Homes</p> <p>We are in agreement that there is a need for accessible and adaptable homes to be provided as part of future developments. However, the draft Policy should include the caveat of viability as part of the decision-making process in order to ensure that schemes can still come forward with suitable facilities, whilst still enabling development on site.</p>
Included files	
Title	Housing Delivery
ID	EGS14502
Person ID	1270685
Full Name	Ms Jan Kerry
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV – HOUS GFRA
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14512
Person ID	1270383
Full Name	Mr Nigel Kerry
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV – HOUS GFRA
Housing Delivery 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 Housing Delivery

ID EGS14525

Person ID 1270690

Full Name Akzo Nobel CIF Nominees Ltd

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment SUP HOUS BER RETL INFR URBD

Housing Delivery comment

Our client supports the provision of a mix of house types and sizes (Policy DM1) and the Council’s approach to affordable housing (Policy DM2). Land at 168-192 High Street, Berkhamsted could deliver circa 80 new homes either through a residential-led mixed-use redevelopment to include 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, subject to viability.

Our client support that Affordable Housing - Policy DM2 seeks to address housing affordability issues in Dacorum Borough, making sure there is a broad mix of house types and sizes and encouraging delivery of affordable housing. It is noted that (where feasible) affordable housing should be genuinely affordable, and the cost will need to be more than 20% below local market prices subject to viability.

In our client's experience, the 'pepper-potting' of affordable housing can only be accommodated on small scale developments only. On larger sites, the scattering of affordable units makes on-site

1 Dacorum Borough Council: The Development Strategy: Background Topic Paper (November 2020) pg.12

management challenging, particularly where there are concierge or other management facilities dedicated to specific tenures and blocks.

Our client supports Policy DM9 and the provision of new specialist housing for older people. The emerging Local Plan seeks to deliver 1,340 new retirement and extra care housing in the Borough. Our client supports this requirement and can confirm Land at 168-192 High Street, Berkhamsted has potential to deliver a managed later-living scheme comprising circa 80 age-restricted apartments combined with common "clubhouse" leisure, retail, healthcare facilities and other ancillary uses at ground level to help meet the Borough's needs. This Site is available and suitable for such retirement living type accommodation given its sustainable town centre location which benefits from good public transport accessibility and is well-served by local shops, amenities and community services. The National Planning Practice Guidance (PPG) (June 2019) paragraph 001 (Reference ID: 63-001- 20190626) states:

"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision- taking".

Our client further supports the provision of accessible and adaptable homes in accordance with Policy DM10 and the requirement for all new build residential units to comply with nationally described space standards (Policy DM12).

In respect to development densities, Policy DM11 requires a minimum density of 70 dph (net) or 30% uplift in town centre locations. Whilst it is recognised minimum densities are fairly crude tools for placemaking, and density should be considered on a site specific basis with consideration for access to public transport, our client supports this policy and good place-making principles of accommodating higher density development in town centres. Land at 168-192 High Street, Berkhamsted is capable of delivering high density development (circa 80 dwellings either as part of a residential-led mixed use scheme or a managed later-living scheme at a density of 182 dph), thus satisfying the Council's minimum density requirements and achieving an efficient use of an underutilised urban and brownfield site.

Included files

Title

Housing Delivery

ID	EGS14538
Person ID	1163978
Full Name	John Wignall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	<u>OBSV</u>
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14593
Person ID	1270707
Full Name	Ms Debbie Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
Included files	
Title	Housing Delivery
ID	EGS14627
Person ID	1270729
Full Name	MR & MRS A HOUGHTON
Organisation Details	
Agent ID	1270728
Agent Name	MS KAREN GALLEY
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS
Housing Delivery comment	The guiding development policy encourages conversion of non-residential properties within settlements to housing. What is the level of this and how is this factored into/able to mitigate the targeted growth need?
Included files	
Title	Housing Delivery
ID	EGS14636
Person ID	1270731
Full Name	MRS JOAN EELEY
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14646
Person ID	1265051
Full Name	Edmund Knox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14700
Person ID	1270752
Full Name	DOUGLAS CANNON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	

Title	Housing Delivery
ID	EGS14712
Person ID	1270753
Full Name	ANNE PIKE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14736
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 * No	
Officer Comment	OBSV - PWCG OBSV - HOUS
Housing Delivery comment	<p>1 <i>The aim is to secure a housing mix across the Borough broadly as shown illustratively below and taking account of the latest Local Housing Needs Assessment and any additional up to date evidence:</i></p> <p><i>Table 5: Indicative Housing Mix Across the Borough</i></p> <p>...</p> <p>1 <i>The housing mix may will vary between different sites, taking account of the location, character and nature of the site. In particular:</i></p> <ol style="list-style-type: none"> 1 <i>sites in highly accessible urban locations are more likely to provide mainly one and two bedroom properties;</i> 2 <i>larger sites are expected to be able to accommodate a wider mix of housing across the development commensurate with their greater potential to create and sustain inclusive mixed communities and help deliver the strategic objectives of the Local Plan;</i> 3 <i>the over-concentration of certain types of residential development will not be supported unless in highly accessible urban</i> <p>2 <i>Decisions on the appropriate mix of homes within development proposals and allocations will also be made on a site by site basis, guided by the latest Local Housing Needs Assessment, and any additional up to date evidence, including housing needs and demands surveys and local demographic context and trends; and informed by other housing market intelligence and site-specific and design considerations to include scheme deliverability.</i></p> <p>It is important to note that the housing mix currently contained at Table 5 is likely to be superseded during the Plan period through updates to the Local Housing Need Assessment.</p> <p>The mix should therefore be referred to as “illustrative” and the wording amended as proposed to ensure there is appropriate flexibility within the policy to allow for changes in demand and enable these to be met through development proposals as and when required. In addition, and as recognised by part 4 of the policy, certain house types may be considered to be more appropriate in certain locations than others and therefore the policy as a whole needs to promote consideration of mix on a site by site basis, to include overall scheme deliverability.</p>

These proposed amendments are considered necessary to ensure the Plan can be considered to be positively prepared and justified in satisfying the NPPF tests of soundness.

Included files

Title Housing Delivery

ID EGS14737

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

Officer Comment OBSV - PWCG
OBSV – HOUS INFR

Housing Delivery comment

*The Council will require proposals to provide affordable homes **as follows and unless it cannot be achieved due to viability reasons or where it would prejudice the need to secure other infrastructure priorities and is supported by a financial viability assessment.***

- 1 Affordable housing provision will be expected to incorporate a mix **and range** of tenures taking into account the Council's most up to date evidence on housing need and any deviation from this **must be demonstrated on a site specific basis, reflective of identified affordable housing needs and demands within a local area (and the district) as well as scheme deliverability. No more than 25% of all housing will be First Homes. The rest of the affordable housing will provide rented accommodation, comprising social rented and affordable rented properties.***

Whilst our client is fully committed to the delivery of policy compliant development, to include 40% on-site affordable housing, in line with the

comments above, the policy itself needs to be future-proofed to ensure that it allows for economic and circumstantial changes. This is particularly important when considered alongside the longevity of the build-out of certain large-scale

schemes and the significant infrastructure required to support such levels of growth, which need to be balanced as part of the overall scheme deliverability.

Similarly, the main aim of tenure mix policies is to ensure a diversified range of new affordable housing homes which respond to specific needs and demands within a local area and across the Borough. An upper restriction on a certain type of affordable housing product is therefore considered too arbitrary and could quickly become superseded by more up to date evidence and market signals.

In addition, the wording specifically refers to First Homes which is an emerging concept, previously consulted on by the Government but not incorporated as part of the recent changes proposed to the NPPF. Affordable housing products should remain consistent with those defined in the NPPF. Furthermore, at paragraph 14.35 of the draft Plan, the Policy is currently seeking a much greater contribution of First Homes “...*than that currently sought for affordable home ownership in the NPPF and assessed through the Local Housing Needs Assessment*”. Therefore, as per the reasons set out above, this approach is not justified or consistent with national policy so would not satisfy the NPPF tests of soundness. It is recognised at paragraph 14.35 (and agreed by our client) that “...*this approach has potential implications for overall viability of schemes and thus the level and split of affordable rent and social rent we can secure in the future.*” The proposed amendments are therefore considered

necessary to ensure the soundness of the Plan and to not undermine the deliverability of strategic growth allocations across the Borough.

Included files	
Title	Housing Delivery
ID	EGS14738
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 * No	Yes
Officer Comment	OBSV - PWCG

Housing Delivery comment

*. On **strategic development sites** ~~housing developments with 40 or more new houses~~, 5% of the house plots should be made available on site as serviced building plots to enable the delivery of self and custom build properties. The provision **should be informed by identified need on the Council’s Self-Build and Custom Build Register** and ~~will take account of the viability of the development.~~*

- 1 *Proposals will be controlled by the following means:*
 - 1 *the Council may seek developments of more than 10 custom build dwellings in a single site location to be developed in accordance with an agreed design code; and*
 - 2 *the Council will require developers to enter into a section 106 agreement that will cover issues including timescales and phasing of serviced plots delivery, appropriate marketing of these plots to self and custom builders **for a period of two years** and ~~length of time~~ after which unsold plots will be returned to the developer.*

It is agreed that larger sites offer the opportunity to meet a greater range of specific housing needs and the provision plots for custom and self-build homes is recognised as part of that. However, it is not clear how the 5% requirement and 40 unit threshold currently proposed within the draft wording, have been derived.

The Custom and Self Build Demand Assessment Framework (January 2020) referred to as underpinning the draft Policy states that over the Plan period, the annual demand for plots is anticipated to range from 38 at the beginning to 48 plots by the end. This is considered to be in addition to the 30 plots that are generally supplied through the planning process per annum. A 5% provision from each of the Growth Areas Bk01 and Bk04 would result in around 45 plots which is equivalent to the demand anticipated for a whole year towards the end of the Plan period. 5% is therefore considered to be an excessive overprovision, particularly when considered alongside other specific housing needs.

Other authorities within the Housing Market Area and wider Hertfordshire area are seeking a 1% provision on-site through up to date policies and generally from larger schemes (e.g. 200 units plus). It is acknowledged, as stated at paragraph 14.61 of the draft Plan that DBC needs to undertake further analysis on an appropriate threshold and that this should inform the next stage of the Plan. The proposed amendments are considered to provide a more suitable means of addressing potential requirements and will allow for provision to come forward based on identified need and subsequently held subject to demand. These changes are considered necessary to ensure when considered against the tests of soundness the Plan can be regarded to be positively prepared and justified.

Included files

Title	Housing Delivery
ID	EGS14739
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 * No	
Officer Comment	OBSV - PWCG OBSV – BK01 HECH URBD INFR
Housing Delivery comment	<p><i>1. The Council will support appropriate densities as per the minimum standards set out below:</i></p> <p><i>Table 11 Density Thresholds</i></p> <p><i>Allocated Growth Areas</i></p> <p><i>Acceptable minimum densities in Growth Areas will be guided by Illustrative Masterplans and respective planning applications for outline schemes and Design Codes to be informed by the site specific allocations and the Dacorum Design Guidance. At an outline scheme</i></p> <p><i>application level this should encourage a range of densities to respond to identified local opportunities and sensitivities across the sites</i></p>

2. *Development will be supported if local circumstances indicate that the density of the scheme would not have an adverse effect on the:*

- a. *character of the area;*
- b. *residential amenity;*
- c. *highway safety;*
- d. *heritage assets;*
- e. ***landscape; or***
- f. *townscape.*

...

4. ***On allocated sites, minimum density standards will be applied to ensure developments make optimal use of the potential of each site to meet identified housing numbers in accordance with the site specific requirements.***
~~*the net*~~

~~*capacity of sites listed in 24 'Proposals and Sites' is expected to be met.*~~

NPPF paragraph 123 states that “*where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure developments make optimal use of the potential of each site*”. It is therefore encouraged that planning policies apply minimum density standards and identify a range of densities based on accessibility and the development potential of different areas.

It is noted that the draft policy seeks to implement this approach at a local level and identifies appropriate uplifts in accordance with paragraph 123

(a) of the NPPF. However, to ensure the policy is wholly consistent with the NPPF and can be considered to be positively prepared, it is

recommended the application of “minimum” standards and support for a range of densities is made explicit.

This is particularly important for strategic sites such as Land at South Berkhamsted, which in delivering sustainable new communities, will comprise different character areas and therefore promote a range of densities. For example, intensification is likely to be more appropriate within the local centre/community hub whereas lower residential density zones comprising larger residential units and plots are likely to be located around the periphery to respect the site edges. The policy therefore needs to ensure there is flexibility at the masterplanning stage to allow for appropriate design responses.

The site specific allocations refer to approximate residential capacities rather than minimum net capacities as suggested in the policy and it is correctly noted that this will be subject to masterplanning. Part 4 of the policy therefore needs to be reworded to ensure it is consistent with the approach being taken at a site specific level and is not pre-empting or unduly hampering the detailed design stages. Instead it should be worded to encourage proposals to optimise site potential, giving consideration to the balance that needs to be achieved in also delivering on-site supporting infrastructure requirements.

Included files	
Title	Housing Delivery
ID	EGS14751
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP – HOUS
Housing Delivery comment	<p>5.0 Policy DM1 Mix of Housing covers delivering a mix of housing sizes and types on developments of 10 or more dwellings. Table 5 sets out the Housing Mix Across the Borough although the policy notes the aim is to secure the mix 'broadly' as shown. Allowing flexibility in mix is essential as different sites in different locations will inevitably deliver variations on this mix owing to site specific matters and also local needs. The need for flexibility is also reinforced at points 4 and 5 of the draft policy. This is supported and it is important that flexibility be secured. It is noted that affordable housing (rent) will include a high proportion of 1 and 2 bedroom houses with further guidance to be provided in a forthcoming Supplementary Planning Document (SPD). This SPD should not seek to change this approach to mix and any further guidance on mix should provide sufficient flexibility as set out in this policy.</p> <p>5.1 Draft Policy DM2 identifies two affordable housing requirements: 35% in the existing urban area of Hemel Hempstead; and 40% on identified Growth Areas and all new dwellings elsewhere. The supporting text acknowledges that further viability work is required to inform these requirements. This work should involve collaboration with developers and</p>

landowners. The draft policy reflects emerging Government policy that 25% of affordable housing will be First Homes. The supporting text acknowledges this is an emerging policy and should be kept under review as the Plan progresses. This approach is supported as the policy should not take an overly restrictive approach to a policy that may well evolve following recent Government consultation. The requirement to ‘pepper-pot’ affordable housing should recognise the management requirements of Registered Providers which inevitably an element of clustering.

Included files	
Title	Housing Delivery
ID	EGS14752
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – EV URBD INFR
Housing Delivery comment	<p>5.2 At Policy DM8 Custom and Self Building states that on developments of forty or more new houses 5% of plots should be made available as serviced plots. The Custom and Self Build Demand Assessment Framework (included in the Evidence Base) confirms that demand for Custom and Self-Build based on the Register for Years 1-5 is 29 dwellings per annum. It also states that estimated current levels of supply are 30 dwellings per annum (see Table 4.2). This indicates that the current approach is delivering sufficient custom and self- build housing to meet local demand and does not indicate any need for a new policy approach. The Register is open to all to join and provides a clear indication of levels of interest in the locality. It is not clear why modelled demand should take precedence over ‘known’ demand as demonstrated by the Register which is being met and has not been shown to require a new policy.</p> <p>5.3 Furthermore, strategic sites are not the most suitable sites on which to provide custom and self-build housing as, by their nature, they do not allow for enough freedom of design, as is usually the desire of those wishing to construct such properties. As this Plan sets out, the strategic sites are to have Design Codes which will set clear design parameters for the developments. This does not meet with the expectations of custom and self-builders who generally expect to have</p>

full design control over their plot. Strategic sites are also often not the best locations for custom and self-builders who generally do not prefer new-build locations.

5.4 Taking account of the above, it is regarded that requirements of Policy DM8 are not fully justified. However, if such a policy is retained and fully evidenced, then it should include an appropriate marketing period after which serviced plots may be returned to developers would be supported. This will allow for flexibility if plots were not taken up and not to affect the competition of a site. An appropriate marketing period should be defined to provide certainty for developers and occupants, to avoid issues of plots being empty for a long time after initial occupation of the development.

5.5 The ongoing viability work also needs to take into account the application of this policy and the interaction with necessary Section 106 contributions towards infrastructure, as well as other development management policy requirements for new dwellings.

Included files	
Title	Housing Delivery
ID	EGS14753
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – PWCG NP HOUS
Housing Delivery comment	5.6 Policy DM10 Accessible and Adaptable Homes sets out requirements for the provision of M4(1), M4(2), M4(3)(a) and M4(3)(b). This should be considered in the viability appraisal of the Plan. The NPPG is clear that a policy to provide enhanced accessibility or adaptability, it should only make reference to Requirement M4(2) and/or M4(3) of the optional requirements. M4(1) is already mandatory through Building Regulations so does not need to be included. The NPPG continues that Local Plan policies should also take into account site-specific factors such as vulnerability to flooding, site topography and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings.

Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied (Reference ID: 56- 008). The NPPG goes on to confirm that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocationg or nominating a person to live in that dwelling (Reference ID: 56-009). This policy wording needs to reflect the NPPG.

Included files	
Title	Housing Delivery
ID	EGS14754
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP – URBD
Housing Delivery comment	5.7 Draft Policy DM11 allows for density to vary across the District and also for allocated Growth Areas density to be guided by Masterplans/Design Codes and informed by specific allocations and the Dacorum Design Guidance. This approach is generally supported. Higher densities should be supported in Growth Areas to achieve efficient use of allocated land.
Included files	
Title	Housing Delivery
ID	EGS14755
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates

Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV EV
Housing Delivery comment	5.8 Draft Policy DM12 requires compliance with the NDSS unless it can be robustly demonstrated that this would not be feasible or viable. The supporting text states that the Council will be reviewing the evidence and need for internal space policies for the next stage of the Plan. Further comments will be provided at this time following the publication of this evidence. Should this policy continue to form part of the plan, it should also be considered through the viability assessment work informing the Plan to ensure it will not cause any viability issues. If it cannot be evidenced that this policy is justified then it should be removed.
Included files	
Title	Housing Delivery
ID	EGS14785
Person ID	1142710
Full Name	Mr Chris Stoneman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV - HOUS

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14796
Person ID	1270798
Full Name	SAYED BEL-BAROO
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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 DMS and reduce this figure from the 'total' housing need figure.</p>
Included files	
Title	Housing Delivery
ID	EGS14822

Person ID	1270804
Full Name	Dr Jessica Field
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS14839
Person ID	325470
Full Name	Gardener Family Trust
Organisation Details	Gardener Family Trust
Agent ID	1270807
Agent Name	Mr Alistair Brodie
Agent Organisation	Henry H Bletsoe & Son LLP
Yes / No	

* Yes	
* No	
Officer Comment	SUP - HOUS
Housing Delivery comment	14 - Housing Delivery - At paragraph 14.3 the plan acknowledges the NPPF requirement to make sufficient provision for housing and we support policy DM2, regarding the provision of an appropriate level of affordable housing within all new schemes. Our clients entirely support the general policies dealing with housing delivery. Our clients acknowledge the policies in relation to Gypsies and Traveller sites but believe that the two currently identified sites should be adequate to meet the existing demand.
Included files	
Title	Housing Delivery
ID	EGS14922
Person ID	329628
Full Name	McCarthy & Stone Retirement Lifestyles Ltd
Organisation Details	McCarthy & Stone Retirement Lifestyles Ltd (“The Retirement Housing Consortium”)
Agent ID	1270838
Agent Name	Miss Carla Fulgoni
Agent Organisation	Planning Appeals and Policy Manager The Planning Bureau Ltd
Yes / No * Yes * No	Yes
Officer Comment	OBJ PWCG
Housing Delivery comment	<p>Please find attached a joint representation made on behalf of McCarthy Stone and Churchill Retirement Living (referred to in the representations as “The Retirement Housing Consortium”).</p> <p>We are a group of independent and competing housebuilders specialising in sheltered housing for the elderly. Together as a group, we are responsible for delivering circa 90% of England’s specialist owner occupied retirement housing. In light of this, we considered it would be appropriate and beneficial to provide the Council with a single response representing our combined views on the documents released for public consultation on the Local Plan Reg 18 consultation.</p>

For your convenience, please find attached our detailed comments with regards to the consultation. I'd be grateful if you could confirm the receipt of this representation. I have also attached an appeal decision which I referenced within the representation.

We support the reference within Policy SP4 - 'Delivering The Housing Strategy' to plan for meeting the needs of the ageing population.

Policy DM1 - Mix of Housing references the housing mix expected within the area. Reference should be made to allow for this to apply only to general needs housing and not to specialist accommodation for older persons.

Policy DM2 - Affordable Housing part 'd' is of concern to the Members of the Retirement Housing Consortium. Part d states: That affordable housing will be sought: 'From all specialist housing for older people falling within the C2 (excluding care/nursing homes) or C3 use classes for age-restricted general market housing, retirement living/sheltered housing or extra care housing.'

Firstly, this policy incorrectly includes extra care housing within the C3 use class classification.

I have attached a recent Appeal Decision at Canterbury, for an extra care scheme for one of the members of the Retirement Housing Consortium. Here the Council refused the application on the basis that it considered that the proposal fell within Use Class C3, largely on the basis of the notion that the apartments were "self-contained". At the 11th hour, however, it withdrew from the Appeal, having finally properly considered the submissions made by the Appellant.

The Inspector determined at Para 56:

'Notwithstanding that the Council has withdrawn its reason for refusal on the provision of affordable housing, local residents have raised concerns with regard to the lack of provision for affordable housing. While I recognise these concerns, given the level of care to be provided in this instance, I concur with the appellant's and the Council's view that the proposed development would fall within C2 use class and that there would not be a policy basis for requiring provision of affordable housing in this particular instance.'

It is worthwhile to note too that at registration of the application, the Council unilaterally changed the application description to “

Proposed 50 no. apartments for older persons with associated communal facilities, parking and landscaping following demolition of 4 no. dwellings”. The inspector changed it back to the “as application form” description of “redevelopment of the site comprising 50 Extra Care apartments for older persons with associated communal facilities, parking and landscaping (C2 use class)”. This emphasises the Inspector's acceptance that the development falls within Class C2 and therefore the policy should not seek Affordable Housing from extra care development.

Secondly, the Local Plan is not supported by viability evidence to support the provision of affordable housing from C2 Extra Care development. It is very well established and understood that retirement housing, whether falling in Class C3 or C2 has very different viability characteristics from conventional housing development and therefore needs to be viability tested separately using appropriate and robust inputs that are relevant to it. Most consultants will undertake such an assessment informed by current good practice and up to date information. No such assessment has been undertaken in this case.

Delivering beneficial Sheltered Housing and Extra Care Accommodation should be prioritised in the local authority to meet its identified housing needs and not unnecessarily confused or complicated by erroneous and misleading statements. Unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population in the local authority area, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives.

Specialist accommodation for the elderly, such as that provided by The Retirement Housing Consortium, will therefore have a vital role in meeting the areas housing needs.

We support Policy DM9 - Housing for Older People and welcome the council's approach in having a standalone policy to support older person's housing but we would submit that this policy should state that extra care accommodation or any accommodation delivered within the C2 use class should not provide affordable housing.

Included files	Canterbury RLP 16-4-20 Allowed.pdf
Title	Housing Delivery
ID	EGS14931
Person ID	1270839
Full Name	EMMA WELLER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS
Housing Delivery comment	<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>

Included files	
Title	Housing Delivery
ID	EGS14950
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	
Officer Comment	<u>OBSV TR01 URBD</u>
Housing Delivery comment	<p>Housing Delivery</p> <p>HCC supports the objective of Policy DM1 of securing a mix of housing across the Borough as whole. HCC particularly welcomes the reference to provision of accommodation for older people, which is a key need within the community. It is important to note that, different types of accommodation result in different density levels, and also have different infrastructure needs. For example, accommodation for older people will not result in demand for school places. This will be addressed further later within these representations.</p> <p>Affordable Housing</p> <p>HCC supports the need to provide affordable housing in situ and the requirement for 40% affordable provision on Growth Area sites as set out at Policy DM2. The level of affordable housing must however be measured against the viability of the development, and also be justified against the Council's own Strategic Viability Assessment of the Local Plan and the IDP, which are ongoing.</p> <p>In relation to criterion 6c, HCC would request some additional wording added to this part of the policy to include reference to the provision of strategic infrastructure, whereby development land is lost or additional costs are incurred in the provision of infrastructure and services beyond that needed by the development itself.</p>

HCC considers that it is important not to predetermine appropriate density levels within allocated Growth Areas, with the design and density of such areas guided by site specific analysis and masterplanning In this respect, HCC supports the text within **Policy DM11** which reflects this approach within Allocated Growth Areas.

It is however not considered that the aim of maintaining density levels for ‘Elsewhere in Dacorum’ is a helpful benchmark, as it is neither clear where this description applies to, nor does it reflect government guidance within the NPPF. Referring specifically to para.123 of the NPPF (June 2018), which states that *‘where there is an existing or anticipated shortfall of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities’*. It goes on to state that minimum density standards should be set through Local Plan policies and that *‘these standards should seek a significant uplift in the average density of residential development within these areas’*.

Finally, this policy does not acknowledge density levels for different types of housing, such as older person housing, which often has a higher density due to the compact nature of these facilities and smaller unit sizes. In this respect a further criterion should be added to **Policy DM11** to acknowledge this.

Included files

Title Housing Delivery

ID EGS14971

Person ID 1207224

Full Name Chris Padley

Organisation Details Environment Agency

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBJ FRAD PWCG

Housing Delivery comment

Policy DM5 - Conversions and changes of use to housing

Flood risk should be a consideration here. Particularly where the proposal includes change in vulnerability i.e. less vulnerable commercial space to more vulnerable residential dwellings. This should also include no basements in a flood zone, change of use to residential in flood zones (in particular basements to residential) should be avoided as they pose a risk to life. You, as the local authority, are responsible for the welfare of residents during a flood event, including shelter.

Avoiding inappropriate development in flood zones will reduce the burden upon yourselves in times of flooding. We suggest that you add the following wording:

'e. the use of flood proofing and resilience measures and no basement dwellings where change of use of proposed in a flood zone.'

Flood risk should also be a consideration here. Annexes are particularly vulnerable to flooding as there is no upper floors for occupants to seek refuge and may be occupied by people who are less mobile than others. Therefore annexes in inappropriate locations pose a risk to life. We suggest the following wording be added:

'd. the annex is not situated in a flood zone 2 or 3'

Again, this policy will need to take into account flood risk. We see a number of applications in Hertfordshire for new sites located within flood zones which pose a risk to life. Gypsy and traveller accommodation is classified as highly vulnerable, in accordance with [Table 2](#) of the National Planning Practice Guidance, Flood Risk and Coastal Change. We suggest that the policy wording is amended to:

'3. New Traveller sites (whether temporary or permanent) in the Green Belt or within flood zones are inappropriate development and will not be approved except in very special circumstances.'

Depending on what is proposed the capacity of the floodplain can be compromised by facilities related to residential moorings, increasing flood risk elsewhere. We suggest the following wording be added to this policy to keep it in line with NPPF requirements:

'f. not reduce the capacity of the floodplain.'

Included files	
Title	Housing Delivery
ID	EGS15044
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	
Officer Comment	OBSV – EV INFR PWCG HOUS HH01 URBD
Housing Delivery comment	<p>Affordable Housing:</p> <p>Draft Policy DM2 seeks to secure a minimum 35% of affordable housing on urban sites in Hemel Hempstead and 40% on greenfield Growth Areas and in the rest of the borough. The supporting evidence is set out in the South-West Herts Local Housing Needs Assessment (August 2020). There is no accompanying assessment of the urban sites as to whether they are capable of delivering 35% affordable housing and be viable. There is no evidence to demonstrate that the overall housing targets are likely to be met through the proposed development strategy. Similarly, the demands upon HGC phase 1 in delivering the wider infrastructure requirements necessary to meet the guiding principles for HGC are not evidenced. The consultation papers do not demonstrate that the greenfield allocation at North East Hemel is capable of delivering 40% - 600 affordable homes.</p> <p>Without the supporting evidence base for review, HLM does not consider the proposed policy DM2 to be effective.</p> <p>Custom and Self Build:</p> <p>Draft Policy DM8 requires 5% of new housing on sites of 40 or more new houses to be made available as serviced building plots to facilitate custom and self-build housing.</p> <p>The Council's latest position is set out in the "Custom and Self Build Demand Assessment (January 2020)" prepared by Three Dragons. It concludes that there could be an annual demand for 68 Custom and Self Build Plots (CSB) a year for the first 5 years of the plan; 74 annually for years 6-10 and 78 per year for years 11-18. This predicted demand totals 1,100 plots over the plan period. This far exceeds the requirements on the register since 2016 which is an indication of likely demand.</p> <p>There is a clear disconnect between the level of demand and the requirements of Policy DM8.</p> <p>The policy requirement for 5% provision for sites over 40 units is not effective. The Council has set out its spatial strategy which is reliant upon urban sites being delivered (at high densities) which will generally comprise of flatted developments. These sites are unlikely to be suitable for CSB. There is a disconnect between the policy and the spatial strategy.</p> <p>It is not appropriate to apply this threshold criteria to larger strategic sites. For example, applying this to the Phase 1 HGC allocation for circa 1,550 homes could equate to inclusion of up to 78 self-build serviced plots for self and custom</p>

builders. The health and safety implications of accommodating this level of self-builders on a scheme of this size whose contractors would not come under the site-wide management plan is not feasible.

Further, applying this criteria in combination with the other development management policies that require 35-40% affordable housing provision on qualifying sites (Draft Policy DM2) and 20% of all new homes to be adaptable and accessible (Draft Policy DM10) would be difficult to manage and regulate if this is applied across a whole development – including the self and custom build units - or, as is more likely, places cumulative burdens on the developer to meet these other requirements from the remaining 95% of units on a site of 40 units or more. A general observation is that strategic sites are not typically the desired location for CSB products. CSB persons are typically looking for smaller sites that are more bespoke. A more flexible policy is required that reflects the nature of CSB.

Housing Densities:

Draft Policy DM11 sets minimum density thresholds for development. The Council has considered applying higher densities to reduce the take of greenfield land for development. As the plan-making progresses detailed consideration will be given to the issue of density at each of the potential allocation sites. The Council needs to be mindful of the fact that density can affect the quality and therefore enjoyment of developments and places. In addition, the issue of density may have a bearing on the viability and therefore deliverability of schemes, which will need to be investigated further and more evidence made available for review to establish if the proposed increase in densities of the allocations being rolled forward are realistic and achievable.

The Council does not appear to have properly tested whether the UCS levels for the urban sites in Hemel are achievable.

Included files	
Title	Housing Delivery
ID	EGS15059
Person ID	1270849
Full Name	Ms Jessica Lindfield
Organisation Details	St William Homes LLP
Agent ID	210999
Agent Name	Mr Martin Friend
Agent Organisation	Director Vincent & Gorbing
Yes / No * Yes * No	

Officer Comment	<u>OBSV HH09 PWCG</u>
Housing Delivery comment	<p>HOUSING DELIVERY</p> <p>Mix of Housing</p> <p>St William support the objective of securing a mix of housing across the Borough as whole, as reflected in Policy DM1. It is important, however, that the mix at each site is considered on its merits, dependent on its location, context and the form of the development It is particularly welcomed and supported that Policy DM1 (part 4a.) recognises that sites in highly accessible urban locations, such as the National Grid site, are more likely to provide smaller properties.</p> <p>Affordable Housing</p> <p>St William recognise the need to provide a proportion of affordable housing. However, as noted above, to ensure sites are deliverable they must not be over burdened by policy requirements and therefore, must take account of the overall viability of It is considered that a clear but pragmatic approach to viability should be embraced in Policy DM2. Whilst there is mention of this at Policy DM2, (clause 6c) this is insufficiently clear or emphasised.</p> <p>To ensure their delivery, sites such as the National Grid site, will therefore require detailed viability analysis at planning application stage to ensure that an appropriate level and tenure mix of affordable housing can be provided taking into account any infrastructure and other S106 requirements such as education contributions that might be required as a result of the development. The need for Policy DM2 to be worded in such a way that there is flexibility is crucial to ensuring that its use in development management does not prevent development coming forward. This is even more important in the context of the current unprecedented economic uncertainty. Unless there is flexibility within the policy development will be potentially delayed or prevented.</p> <p>St William object to Clause 3 of Policy DM2 on the basis that it is not clear and lacks any It states that <i>“Affordable housing provision will be expected to incorporate a mix of tenures taking into account the Council’s most up to date evidence on housing need.”</i> However, it then sets a specific mix: <i>“No more than 25% of all housing will be First Homes. The rest of the affordable housing will provide rented accommodation, comprising social rented and affordable rented properties”</i></p> <p>The reference to First Homes is, in any event, at this stage questionable. The latest draft revision to the NPPF does not include guidance on First Homes and unless or until it does, this policy is contrary to Government guidance. If it were to be retained, the policy should make clear that the “25% of all housing” to be First Homes means 25% of all affordable housing. Secondly, the wording of this policy will need to be reviewed in the light of the Government’s proposed amendment to the NPPF on First Homes if that does eventually The Government has indicated in their response to the consultation on First Homes that 25% is likely to be a minimum threshold.</p> <p>Thirdly, objection is raised to the requirement that all affordable housing that is not First Homes must be social or affordable rent. Whilst St William recognise the importance of the social rented and affordable rented affordable sectors, DM2 should allow for the inclusion of other tenures including shared equity or shared ownership. Indeed, the tenure split of affordable housing is likely to have a significant impact on overall viability of development.</p> <p>The deliverability of the National Grid site will clearly turn on both the quantum and tenure The expectation of DM2 that all affordable homes that are not First Homes will be provided as social rented homes is unrealistic. It is essential that</p>

the policy allows greater flexibility in terms of the overall delivery of affordable housing. Policy DM2 should therefore be amended to recognise whilst the Council's priority is presently for social and affordable rent, shared ownership and intermediate dwellings will form part of the overall affordable housing package on any site to ensure a viable quantum of affordable housing is provided.

St William suggest the following proposed amendment to the policy :-

“Affordable housing provision will be expected to incorporate a mix of tenures taking into account the Council’s most up to date evidence on housing need. The affordable housing will include social rented and affordable rented properties, and mixed tenure/shared ownership units. The Council will consider the mix of tenures alongside the overall quantum of affordable homes, taking account the viability of development.”

Objection is also raised to clause 7 of Policy St William are committed to ensuring that new development is ‘tenure blind’ – indeed all of their developments are tenure blind. However, objection is raised to the requirement that affordable housing be ‘pepper-potted’ across the development. This term is vague and often used to argue that individual properties should be spread around new development. This fails to recognise the management arrangements of registered providers, particularly in developments of apartments, that require clusters of affordable homes around common cores. Additional management costs associated with dispersed properties are reflected in the value of the affordable housing, putting further pressure on viability.

Custom and Self Build Housing

St William object to Policy DM8 – Custom and Self Build Housing – as presently The requirement to provide 5% of housing plots on all sites over 40 homes should be expressed in a manner that allows some flexibility. Whilst the policy as presently drafted allows for viability to be taken into account, it does not allow for the feasibility of having self build plots as part of a larger development. This is particularly so on higher density schemes of predominantly apartments where providing ‘plots’ per se is simply not practical. The imposition of custom and self build housing on larger sites in a single ownership will impact on overall viability and threaten deliverability.

Moreover, in the case of the National Grid site, which is heavily contaminated land, it is not feasible to allow for self build development given the health and safety St William will be fully remediating the site for residential use and will need to retain control and responsibility for this throughout the development process and the subsequent verification of completion of all remediation across the whole site. In this context it is simply not practical to make individual plots available to third party builders.

Moreover, serious concerns are raised that the imposition of custom and self building plots on the scheme will undermine the objectives of place-making and delivering the highest possible quality of design, as well as further potentially impacting on viability of the Accordingly, it is considered that the policy should apply to greenfield sites only. The policy should therefore be amended to read :-

“On housing developments with 40 or more new houses on greenfield sites, the Council will seek 5% of the house plots should be made available on site as serviced building plots to enable the delivery of self and custom build properties. Any provision will take account of the viability of the development and the feasibility of provision given the form of the development and characteristics of the site.”

Accessible and Adaptable Homes

St William consider that policies on accessible and adaptable homes need to be applied with some flexibility and with due consideration given to the overall impact on viability of development. Policy DM10 should be amended to make clear that *“the Council will seek to ensure that a proportion of new housing should be designed to be accessible and adaptable, taking account of overall scheme viability.”*

Density of Development

As stated earlier in these representations, St William support the clear approach of the DESG in making effective use of land and increasing densities in the most accessible. This approach is fully in accordance with the NPPF. The Berkeley Group place great emphasis on high quality design; they create bespoke placemaking strategies for each site and develop masterplans which are co-designed with local stakeholders so they have clear community influence and support and reflect local views and aspirations. The Berkeley Group have delivered numerous schemes with these underlining objectives and have demonstrable experience of delivering higher densities whilst delivering excellent placemaking and sustainable communities. Optimising density whilst delivering design-led high quality development is therefore welcomed and is entirely achievable.

Accordingly, St William support policy DM11, albeit we generally consider that the use of habitable rooms per hectare (hrph) is a more appropriate measure of density than dwelling per hectare, particularly for urban areas such as Hemel Hempstead. We note and support the approach in the policy of establishing minimum densities set out in table 11.

Nationally Described Space Standard

St William support Policy DM12 on the basis that it requires compliance unless it can be demonstrated that this would not be feasible or viable. It is essential that this flexibility is retained in the Regulation 19 plan.

Included files	
Title	Housing Delivery
ID	EGS15072
Person ID	1158050
Full Name	Mark Behrendt
Organisation Details	Planning Manager – Local Plans Home Builders Federation
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Officer Comment	OBSV – EV HOUS NP
Housing Delivery comment	<p>1 The Council have not published a viability study as part of the evidence supporting this stage of the consultation. As such we cannot comment on whether the cumulative impact of this and other policies will render development unviable. To support local planning authorities in preparing their viability evidence the HBF has prepared a briefing note, attached to this response, which sets out some common concerns with viability testing of local plans under the latest guidance and how these should be addressed.</p> <p>1 The reason why we produced this note was the increased focus in the 2019 National Planning Policy Framework (NPPF) on development viability being resolved through the local plan and not at the planning application. The aim of the approach is to ensure that, as outlined in paragraph 57 of the NPPF, decision makers can assume that development which is in conformity with the</p> <p>local plan is viable and to, ultimately, reduce the amount of site-by-site negotiation that takes place. This makes it much more important that the Council's approach to its viability assessment and the costs it places on development are cautious to take account of the variability in delivering the range of sites that will come forward through the local plan.</p>
Included files	
Title	Housing Delivery
ID	EGS15073
Person ID	1158050
Full Name	Mark Behrendt
Organisation Details	Planning Manager – Local Plans Home Builders Federation
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

<p>* Yes</p> <p>* No</p>	
<p>Officer Comment</p>	<p>OBSV - PWCG HOUS EV</p>
<p>Housing Delivery comment</p>	<p>1 Whilst the HBF are supportive of the self-build and custom housebuilding sector we remain concerned that policies with regard to the provision of self-build plots seek to place the burden of delivery on to the development. It is important to recognise that paragraphs 57-024 and 57-025 of the PPG sets out a variety of approaches that need to be considered – including the use of the Council’s own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council’s to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. We would suggest that in the first instance rather than place additional burdens on house builders for the provision of self-build plots the Council should utilise its own land or seek to engage with landowners to identify suitable sites on which to deliver serviced self-build plots.</p> <p>1 The policy must also provide greater clarity as to the application of this policy. Firstly, the Council will need to set out that this policy will not apply to flatted development given the near impossibility of delivering self-build in a flatted. This would appear to be the case given that reference is made to the policy only applying to developments of 40 or more new houses, but this must be clarified. Secondly the Council will need to set out in policy when any unsold plots required through this policy will return to the developer. We would suggest that where plots are not sold within six months of being offered to people registered on the Council’s self-build register then they should return to the developer to be built out. This will ensure that plots do not sit empty and that the homes needed in Dacorum are delivered in a timely manner.</p> <p>1 Finally, we have some concerns regarding the evidence supporting this policy. Firstly, it will be important for the Council to set out how many self-build plots this policy expects to deliver to ensure that it is a proportionate response to the evidence regarding the demand for such. Secondly the evidence in Demand Assessment Framework is a modelled level of demand based on unpublished survey data collected by the National Custom and Self Build Association (NaCSBA). This has been profiled against existing households and suggests levels of demand which are double that set out in the self-build register. In order to justify such a significant increase in demand, which will place an additional burden on housebuilders in Dacorum, the Council will need to set out this data in full. As the Council acknowledge they are only required to deliver plots based on self-build registers and at present that demand is seemingly being met without the proposed policy. The Council will therefore need a more robust justification for policy DM8.</p>
<p>Included files</p>	
<p>Title</p>	<p>Housing Delivery</p>

ID	EGS15074
Person ID	1158050
Full Name	Mark Behrendt
Organisation Details	Planning Manager – Local Plans Home Builders Federation
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV – EV PWCG HOUS
Housing Delivery comment	<p>1 As the Council note in the housing topic paper further work is required to justify the adoption of space standards. If the Council can justify this policy, we would suggest that some degree of flexibility is included. The HBF is concerned that the approach taken by the Council could prevent development that will meet the needs of some its residents from coming forward. Whilst the HBF share the Council desires to see good quality homes delivered within Dacorum we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer In terms of choice, for example, some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow families on lower incomes to afford a property which has their required number of bedrooms. These concerns are especially pertinent in areas where affordability of housing is so poor. It is therefore important that the Council can provide some flexibility in this policy to allow the development of well-designed homes that may not meet all the space standards if such homes meet a specific need in their community.</p>
Included files	
Title	Housing Delivery
ID	EGS15100
Person ID	1270925
Full Name	Mrs Kathryn Salway
Organisation Details	Extinction Rebellion Dacorum
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<p>Housing Delivery: Affordable Housing</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>
Included files	
Title	Housing Delivery
ID	EGS15134
Person ID	1270940
Full Name	
Organisation Details	CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP BOV BV01 HOUS
Housing Delivery comment	<p>Section 14 of the Emerging LP has regard to <i>Housing Delivery</i> and Policy DM1: Mix of Housing requires that developments of 10 or more homes to provide an appropriate mix of housing types, sizes and tenures, which BPC supports, and would expect that the promoters of the proposed housing allocation at Grange Farm in Bovingdon will take on board in order to meet known local needs for all types, sizes and tenures of housing and appropriate groups.</p> <p>Policy DM2 has regard to Affordable Housing, and BPC will expect that promoters and developers of any proposed housing allocation sites within the village will have regard to the requirements of local needs housing assessments in</p>

determining the mix, types and tenures of any new housing within those developments. BPC would expect that the affordable housing element on any site within the village would be policy compliant, that is, at the minimum provision of 40% or greater.

Policy DM9 has regard to **Housing for Older People** and it is understood from ongoing engagement with the promoters of the proposed housing site at Grange Farm, Bovingdon (Bv01) that there will be a dedicated area within the masterplan that has been developed for that site that will be set aside for the provision of such specialist housing, which BPC supports.

Included files	
Title	Housing Delivery
ID	EGS15151
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ COVID EMPL RETL HOUS GRBT
Housing Delivery comment	The Guiding Development policies fail to recognise the opportunities, presented by rapid changes to the economy, for dwellings to be built on Brownfield land. Deloitte's Global Consumer Tracker shows that close to 30% of consumers in the UK now shop online for food and non-food. According to the British Retail Consortium (BRC), sales of non-food items in physical shops have collapsed by 24%. These changes have led to record numbers of store closures. So, Brownfield sites, that were earmarked for office and retail use, are becoming available for housing. Use of brownfield sites would reduce the need to build on the Green belt, reduce the amount of urban decay and promote urban renewal. The Guiding Development Policies fail to capitalise on these opportunities.
Included files	
Title	Housing Delivery
ID	EGS15172

Person ID	1270993
Full Name	MRS MERRIL TRUEMAN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBSV HOUS
Housing Delivery comment	<p>The proposed Policy OMS, in providing the principle of convers'ion of houses to flats and non-residential properties to housing, this provides an opportunity for the delivery of housjng 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 OMS. Should the plan identify the housing provision that will come from DM5 and reduce this figure from the 'total' housing need figure.</p>
Included files	
Title	Housing Delivery
ID	EGS15182
Person ID	1270998
Full Name	PAUL HARRIS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Officer Comment	OBSV HOUS
Housing Delivery comment	<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 OMS and reduce this figure from the 'total' housing need figure.</p>
Included files	
Title	Housing Delivery
ID	EGS15192
Person ID	1142578
Full Name	Mr Norman Brooks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>

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 Housing Delivery

ID EGS15231

Person ID 1271006

Full Name Ms Zoe Wiggins

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Officer Comment OBSV

Housing Delivery comment The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.

Included files

Title Housing Delivery

ID EGS15245

Person ID 1271086

Full Name MRS PATRICIA BEL-BARKO

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS15287
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
Officer Comment	OBJ HOUS PWCG
Housing Delivery comment	<p><u>Chapter 14 : Housing Delivery</u></p> <ul style="list-style-type: none"> • <u>Policy DM2 Affordable Housing</u> : In DM2(3) there is a specific reference to 'First Homes'. The terminology remains in flux and it is suggested that this is re-worded as "<i>affordable ownership properties</i>".

- **Policy DM8 Custom and Self Build Housing** : There is insufficient evidence to justify the proposed 5% figure. The 5% figure is currently explained on the basis of the 'Three Dragons' report from January. However, this report only says

demand 'may' be for 70 dwellings per annum. Indeed, the report notes that the current annual supply of CSB units is in line with demand. The 5% CSB aspiration is also more than double the number of applicants on the Register. This requirement for 5% CSB housing could impact on viability.

As a separate point, it is unclear from the policy whether the 5% applies to all housing units or just the open market element. Also, it is unclear whether any of the CSB units will be required to be affordable housing.

Policy DM9 : Housing for Older People : To be consistent with Policy DM2 and paragraph 14.63, DM9(5) should state that care and nursing homes are exempt from providing affordable housing.

Included files

Title Housing Delivery

ID EGS15326

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

Officer Comment OBJ – EMPL COVID URBD GRBT GRO LAND

Housing Delivery comment

Housing delivery

The change in employment patterns and reduction in demand for office space caused by the pandemic, will allow use of brownfield sites to be redeveloped and for commercial buildings to be converted to residential use. 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. The projected numbers of new houses is too high for the rural nature of Dacorum and its proximity to the Chilterns AONB.

Included files	
Title	Housing Delivery
ID	EGS15341
Person ID	1271220
Full Name	MAUREEN RUMSEY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	
Housing Delivery comment	
Included files	
Title	Housing Delivery
ID	EGS15381
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	
Officer Comment	OBJ HOUS BV01 PWCG

Housing Delivery comment

Policy DM1 (Mix of Housing) and Policy DM9 (Housing for Older People)

Whiteacre argues that there is a substantial unmet need for specialist accommodation for older people and that the emerging strategy is not seeking to expressly address this. There is essentially a requirement for delivery on some strategic sites, but this is unlikely to be justified in terms of viability or phasing in all cases.

The South West Hertfordshire Local Housing Needs Assessment has assessed the local need for specialist housing for older people. Their evidence has identified the need for different forms of accommodation as the care and support needs of older people and their ability to live independently changes over their lifetime. There are many forms of such accommodation and whether they are defined as residential institutions (Class C2) or dwelling-houses (Class C3) within the Use Classes Order can be subject to interpretation.

Existing commitments and windfall sites are not expected to meet the identified need for housing for older people. Therefore, the policy requires an element of such housing on some of the strategic sites. Policy DM9 could therefore be strengthened to include specific strategic sites, such as Grange Farm where they can meet the need for housing for older people.

We note in Policy DM1 ('Mix of Housing') the requirement for developments of 10 or more homes to include "*a mix of housing types and sizes to meet the needs of all sections of the community*", including "*accommodation for older people*". These provisions are generally supported, but it is currently unclear how each of these forms of housing would be brought forward on development sites through Policy DM1. In particular, there does not appear to be a mechanism for ensuring delivery of sufficient residential or care home provision as these cannot simply be delivered as a proportion of housing units.

The Plan is also drafted on the basis that the care bed requirement is planned for separately to the housing requirement. Policy DM9(4) recognises the benefit of integrating community services and facilities; DM9(5) envisages provision of affordable housing contributions from C2 or C3 accommodation.

The "*Housing for older and disabled people*" PPG advises that it is for local authorities to decide based on the level of care and scale of communal facilities provided. The Council will generally seek a contribution towards affordable housing from such developments where it falls within Use Classes C2 and C3, except in the case of residential care/nursing homes. Further detail on the Council's approach will be provided in the Affordable Housing SPD.

Whilst paragraph 2 of Policy DM9 states that some of the Growth Areas have specific requirements for the inclusion of an element of housing for older people, there is no clear mechanism for how other forms of specialist accommodation, particularly residential care or nursing homes (C2) will be delivered other than stating that they will be 'encouraged' (Policy DM9, paragraph 3). In order to be effective, it is necessary for the Plan to specify where suitable provision can be achieved.

The proposed allocation at Grange Farm has consistently been assessed as having the potential to deliver specialist elderly housing (see the AECOM Site Assessment Study).

It should be noted that in moderating the capacity for development to 150 units (from 250), the Council's Site Selection Report omits any reference to the potential to support delivery of housing for older people. The policy criteria for the proposed allocation of the site also omit any reference to demonstrating how suitable provision can be provided on site. This should be subject to modification prior to issuing the Pre-Submission version of the Plan. This would accord with the relevant Planning Practice Guidance in providing certainty in how unmet needs for specialist accommodation will be addressed, including taking account of local demand for this type of accommodation in Bovingdon (ID: 63-013-20190626)

The current indicative Masterplan proposals for Grange Farm (see Appendix 1) incorporate land for up to 80 beds in a separate self-contained parcel of the site off Chesham Road. The location of the site would accord with Planning Practice Guidance in terms of providing for the types of specialist housing for older people identified in the Planning Practice Guidance (Reference ID: 63-010-20190626). The location of the site, within the context of the wider proposed Grange Farm allocation, satisfies the relevant PPG in terms of providing age- friendly and accessible specialist elderly housing, including the characteristics of the site and links to nearby open space (PPG ID: 63-018-20190626).

Whiteacre argues that there is a substantial unmet need for specialist accommodation for older people which the emerging strategy is not seeking to expressly address.

Existing commitments and windfall sites are not expected to meet the identified need for housing for older people. Therefore, the policy requires an element of such housing on some of the strategic sites. **Policy DM9** could therefore be strengthened to include specific strategic sites, such as Grange Farm where they can meet the need for housing for older people.

Included files	
Title	Housing Delivery
ID	EGS15395
Person ID	1271257
Full Name	Mr Alastair Hogben
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBSV - HOUS

Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS15407
Person ID	1259631
Full Name	Fay Copestake
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ HOUS
Housing Delivery comment	Are housing needs included in conversion of offices and larger houses to flats (proposed policy DM5)?
Included files	
Title	Housing Delivery
ID	EGS15433
Person ID	1271088
Full Name	MIKE WALTERS
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS15455
Person ID	1271103
Full Name	GRAHAM RITCHIE
Organisation Details	FAIRFAX STRATEGIC LAND (HEMEL) LTD
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	NOC
Housing Delivery comment	SEE ATTACHED RESPONSE

Included files	
Title	Housing Delivery
ID	EGS15483
Person ID	1271381
Full Name	Alison Walker
Organisation Details	Associate Director of Strategic/Large Projects Thakeham Homes
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	SUP DM1
Housing Delivery comment	<p>1.1 Whilst we do not wish to comment on the detail of this Policy at this stage, we note that it comments:</p> <p><i>“larger sites are expected to be able to accommodate a wider mix of housing across the development commensurate with their greater potential to create and sustain inclusive mixed communities and help deliver the strategic objectives of the Local Plan.”</i></p> <ul style="list-style-type: none"> We support the recognition of the important role that larger sites can play in providing for a wider range of needs. Concern is raised that this has not directly informed the Council’s approach to the allocation of sites at Berkhamsted in particular where a series of smaller allocations are proposed. As recognised by the Council these smaller allocations will not deliver wider benefits and as broader mix of housing as a smaller number of larger allocations would do. Our client’s proposals for Bulbourne Cross and the benefits it could deliver are discussed at Section Four of this
Included files	
Title	Housing Delivery
ID	EGS15537

Person ID	1271381
Full Name	Alison Walker
Organisation Details	Associate Director of Strategic/Large Projects Thakeham Homes
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ DM2 DM8 DM10
Housing Delivery comment	<ul style="list-style-type: none"> Item 4 under Policy DM2 'Affordable Housing' states that "<i>All affordable housing should be genuinely affordable, with the expectation being that the cost will need to be substantially more than 20% below local market prices and rents</i>". Whilst Thakeham supports the delivery of policy-compliant affordable housing on-site, it does not think it is appropriate for the Council to set the value of affordable dwellings as this has the potential to impact the viability of a scheme. National planning policy defines affordable housing, and the policy must accord with those definitions, which may change throughout the plan Item 2 under Policy DM8 states that "On housing developments with 40 or more new houses, 5% of the house plots should be made available on site as serviced building plots to enable the delivery of self and custom build properties". In order to allow flexibility to reflect the changing demands for self-build and its potential impact on a site's viability, Thakeham would like to request that the requirement is amended to "up to 5% of the house plots" and also that the threshold to which this policy applies is Table 9 of Policy DM10 'Accessible and Adaptable Homes' sets out the percentage of each housing type and tenure under Building Regulations to be included within housing Whilst Thakeham supports the provision of affordable, accessible and adaptable dwellings, we raise concern that the requirement specifically for M4(3) units is high and the level should be agreed on a site by site basis, considering current need, location, scheme viability and impact on density.

Included files	
Title	Housing Delivery
ID	EGS15542
Person ID	1271479
Full Name	MS JANE HARRISON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ GRO
Housing Delivery comment	<ul style="list-style-type: none"> • Within the emerging Local Plan, the Council identify strategic objectives including “Delivering Dacorum’s Future with Homes for Everyone”. One of the objectives underpinning this heading is “To meet the needs of older people and other groups who need specialist housing”. • First, we are pleased that Dacorum Borough Council is recognising and seeking to address the housing needs of older people as part of its emerging Local We are aware that it is not a straightforward consideration, however, should be addressed at the plan-making stage, as opposed to on an individual site-by-site basis via Applications/Appeals. • Policy DM 9 (Housing for Older People) sets out that specialist housing is encouraged on sites located close to good public transport, local amenities, health services and town, district or local The policy also states that: • Within the “Delivery Strategies” and “Proposals and Sites” sections of the plan, the site allocations are listed with the quantum of homes allocated provided for In relation to housing for older people, the requirement states “including provision for older people” within proformas for 5 different growth area site allocations. No precise quantum or percentage of the overall housing number is provided; nor is the type of housing (i.e. retirement, extra care) defined. Combined, the 5 allocations which include “including provision for older people” total 4,600 dwellings.

- In order for these growth area allocations to address the identified need for 1,340 retirement and extra care housing units, an average of 1% of the dwellings across the sites would need to be delivered as retirement or extra care housing. This is unrealistic and is highly unlikely to be delivered.
- Further, when this implied requirement of 1% accommodation for older people is considered in combination with the requirement for 40% affordable housing, it is apparent that the proposed approach is fundamentally flawed and undeliverable. A significant proportion of the need for accommodation for older people will need to be addressed elsewhere via specific allocations.
- Based on our client's extensive experience in the sector, a minimum of 60 extra care housing units are required in order to make an extra care development. However, in order to provide a full range of amenities (to the health and wellbeing benefit of residents, and with an affordable service charge), extra care developments should comprise 100 or more units. In addition, due to the care requirements, Extra Care Housing rarely comes forward as a component of larger planned development and are most effectively delivered via specific purpose build developments by retirement and extra care accommodation providers.
- Whilst DM9 states that "Retirement villages providing a range of different types of housing for older people will be encouraged on suitable and well-located sites", no such sites are allocated within the
- The Policy appears to seek to address recommendation 7 of the recent ARCO and County Council's Network (CCN) Report 1 which states:

Retirement Communities represent the fastest growing form of provision for older people's housing, yet because they are a relatively recent phenomenon they are often overlooked when specific forms of housing need are being assessed. Including policies specific to older people's housing, and including Retirement Communities as part of the mix, will help to increase the choices communities have. [...]"

- Whilst the emerging Plan pays lip service to this objective, there is a lack of any meaningful commitment for the Plan to deliver retirement. This could be achieved via specific allocations for retirement communities including exploration of opportunities to extend existing communities.

- The forward to the ARCO CCN Report was provided by David Williams, the Leader of Hertfordshire County Council and Chair of the The DBC Local Plan provides the opportunity for Dacorum to lead the way in implementing the recommendations within the ARCO Report.

*1 Planning for Retirement: How Retirement Communities can help meet the needs of our ageing population (June 2020)
Available: <https://www.countycouncilsnetwork.org.uk/give-councils-and-providers-the-tools-to-incentivise-retirement-communities-new-report-argues/>*

- The impact of the Council’s strategy for older persons housing on delivery timescales should also be The “growth area” sites, within which the undefined amount of older persons housing is included, are allocated for at least 400 dwellings with some much larger.
- Due to their scale, the planning application preparation and determination (outline and reserved matters) associated with these sites is likely to take several Following this, new infrastructure would need to be delivered in advance of housing completions meaning that these sites will not deliver completions until the middle part of the Plan Period (5 years post adoption) at the earliest. Any retirement/extra care element of these sites would need to follow the installation of the strategic site infrastructure and then the site-specific retirement/extra care infrastructure. This is likely to add further delay to the delivery of this type of housing.
- Within the South West Hertfordshire Local Housing Needs Assessment (LHNA) (2020), the existing (2020) Older Persons Dwelling Requirements with DBC was assessed to be as follows (taken from table 90 of the LHNA):
 - Leasehold retirement housing - 325
 - Extra Care rented - 231
 - Extra Care Leasehold - 157
- The above demonstrates that there is an **existing** unmet need for accommodation for older people, which is projected to rise across the Plan The strategy within the Local Plan which suggests this need can be addressed within growth area sites (which will deliver mid/late in the Plan Period) does not address the need with sufficient urgency.

- Notwithstanding our previously mentioned concerns as to the soundness of the Council’s approach (including an undefined proportion of older persons housing within growth area allocations), should the Council decide to proceed with the strategy, **it is essential that this is supported by other allocations for specific retirement/extra care housing.**
- Whilst DM9 states that “Retirement villages providing a range of different types of housing for older people will be encouraged on suitable and well-located sites”, no such sites are allocated within the
- Given the AONB and Green Belt constraints of the Borough, opportunities of such sites coming forward will be Specific allocations **should be included** to meet the need most effectively for older persons housing and ensure the delivery of older persons housing in the shorter term.
- Retirement Villages’ site which would serve as an extension to the south of the existing Castle Village would provide 60 extra care dwellings in the **short term**. The Site is readily deliverable due to the existing specialist infrastructure provision at Castle The allocation of this site would complement any longer-term prospects for delivery of older persons housing through the Plan Period.

Included files	
Title	Housing Delivery
ID	EGS15549
Person ID	1271479
Full Name	MS JANE HARRISON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ PWCG

- Policy DM2 at part 1 (d) requires Affordable Housing to be delivered from all specialist housing for older people falling within C2 or C3 use A specific proportion is not mentioned and, therefore it is unclear whether the requirements at part 1 (a) of the policy (40% on-site affordable housing provision) would be deemed to apply or would constitute a “starting position” for negotiations.
- We note that the supporting text to the policy (para 14.36) identifies that affordable housing contributions from specialist accommodation for older people is less viable than general housing (due to more expensive fit outs and on-going costs) and, on this basis, a lower contribution than from general housing will likely be. Whilst this acknowledgement is welcomed, this could be better reflected within the policy itself.
- Paragraph 36 goes on to state that in the case of care homes, affordable bed spaces may be sought within private developments to meet social care needs. This is the only type of specialist older persons housing where on-site provision is referenced.
- Paragraph 37 goes on to state that off-site provision of financial contributions in lieu of on-site provision will only be accepted in exceptional circumstances. “Some forms of accommodation for older people” is provided as the relevant example of where off-site provision may be acceptable and siting practical difficulties of securing social units/bedspaces. We welcome the acknowledgement that specialist housing for older people should be treated differently to standard housing due to their very different viability and operational characteristics. However, it would be helpful for the supporting text to be more explicit in identifying the types of accommodation for older people which are not expected to deliver on site provision.
- In relation to the Extra Care Housing typology, the most straight forward route for any such contributions would ordinarily be in the form of off-site contributions towards affordable provision. This is due to the level and extent of on-site services and facilities that are accessible to all residents. The clearest example of this, is the monthly/annual service charge that is applicable in all Retirement Villages schemes which is circa £6-8,000.00 per annum. The service charge is payable by all residents and would be in addition to the cost of purchase or rent. It is extremely unlikely that any persons reliant upon a State Pension and seeking “social rent” provision would be able to meet such an additional monthly/annual cost.

- In light of the above, we request that Policy DM2 is updated to make clear that on-site provision of affordable housing will not be sought in the case of Extra Care For clarity, the policy should state that, subject to viability, financial payments towards off-site provision will be required.

Policy DM9: Housing for Older People

- This policy is **unsound** for the reasons set out fully at section 7 of these To summarise:
- This policy does not adequately seek to address the increasing demand for older peoples housing identified within the SMHA 2016, LHNA
- the need for older persons housing arising across the Plan Period (2020-2038) is not accurately reflected within the policy which only considers need arising 2020-2036.
- The strategy which seeks to entirely address needs within growth area sites is There is no certainty that the older persons housing element of these sites will be delivered; certainly not in the numbers required.
- Even in the event that sites do deliver an element of housing for older people, these sites will deliver in medium to long term and cannot be relied upon to meet the considerable **existing** unmet needs which will continue to rise during the Plan
- Specific allocations for older persons housing should be included within the
- The most obvious and certain way of delivering older persons housing is by an extension to the south of Retirement Villages' existing site Castle This would provide approximately 60 Extra Care (Use Class C2).

Included files	
Title	Housing Delivery
ID	EGS15557
Person ID	1264530
Full Name	BRENDA AND ROY HURLEY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
Officer Comment	OBSV - HOUS
Housing Delivery comment	<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>
Included files	
Title	Housing Delivery
ID	EGS15581
Person ID	1271579
Full Name	
Organisation Details	BOYER PLANNING ON BEHALF OF W LAMB LTD
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	OBJ HOUS PWCG
Housing Delivery comment	<ul style="list-style-type: none"> • Policy DM2 explains that for proposals of at least 10 dwellings, the Council will seek 40% affordable housing provision on the identified Growth Areas, 35% affordable housing provision in the existing urban area of Hemel Hempstead and 40% affordable housing provision of all new dwellings elsewhere. The policy acknowledges that judgements about the level, mix and tenure of affordable homes will have regard to the overall viability of the scheme and any abnormal • Whilst there may be scope for affordable housing requirements to be flexibly applied, where a viability assessment accompanies a planning application, the policy implies that either 40% or 35% provision will generally be expected.

This represents a high tariff, which (when applied in conjunction with the Community Infrastructure Levy ('CIL') and other contributions) may impede

- The Standard Method does not disaggregate that need into different types and tenures of To address this, the PPG states that;

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

“Therefore the need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately.”

- The PPG further adds that;

“Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- *the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);*
- *the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and,*
- *the anticipated deliverability of different forms of provision, having regard to ”*

- The identified need for affordable housing represents a significant proportion of the overall housing need figure and relying on a 40% affordable housing tariff could impede viability and hinder effective
- A key concern is that, planning applications will need to be accompanied by a viability assessment, which will need to be negotiated with the LPA. Inevitably, this will result in delays and increase the likelihood of planning appeals. This contradicts the purpose and intention of NPPF paragraph
- In the interests of the soundness of the Plan, it is recommended that a full plan viability assessment be prepared in order to test the proposed level of affordable
- It is considered that there is a disconnect between the wording at Paragraph 14.36 and the Policy at 1 d) in relation to specialist housing for older people with regard to the acknowledgement that affordable housing is not viable from such schemes. This should be reviewed and amended. Further to which there should be a clear distinction that Use Class C2 care should not be required to deliver affordable housing.

- Policy DM8 requires that on housing developments with 40 or more new houses, 5% of the house plots should be made available on site as serviced building plots to enable the delivery of self and custom build properties. The policy acknowledges that the provision will take account of the viability of the
- It must be recognised that self-build creates design and deliverability issues, and therefore there must be flexibility in the requirement. There are also potential health and safety implications of self-build on larger development sites so they can only be considered in specific locations, if justified in the first

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

- Joining the Self-build Register does not necessarily mean that those signed up will want to take up the homes in reality, or that they are in a genuine position to be able to proceed. The Self-build Register can therefore lead to unnecessarily inflated
- It is also considered that the threshold for the provision of self-build homes should be Sites of c.40 homes would not necessarily have the space to separate off a phase for self-build (which is necessary for health and safety), and a separate access may even be required for the self-build plots. Where people are building their own homes they will need to be separated from the main development site for health and safety as the main site will include a large number of site workers and heavy plant and machinery, as well as regular deliveries etc.
- Policy H8 should therefore be amended as follows:

*“On housing development with 40 or more new houses, 5% of the house plots should be made available on site as serviced building plots to enable the delivery of self and custom build properties **where there is an identified need and it has been demonstrated that interested parties are genuinely ready to proceed.** The provision will take account of the viability of the development.”*

- The wording set out in relation to Policy DM9 5) it is considered that there is a disconnect between the wording at Paragraph 14.36 and Policy DM9 5) given the acknowledgement at paragraph 14.36 that affordable housing is not viable from such specialist care housing In the interests of soundness, the Policy should be reviewed and amended. Further to which there should be a clear distinction that Use Class C2 care homes should not be required to deliver affordable housing. Care providers will simply be unable to compete with house builders in the very locations that the Council is seeking to support such proposals.

The Council should publish a viability assessment to demonstrate that in all instances C2 Use Class uses can afford to deliver affordable housing

Included files

Title Housing Delivery

ID EGS15610

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

Officer Comment OBSV – EMPL PWCG

Housing Delivery comment Section 14 Housing Delivery

Policy DM1 requires a mix of housing types, sizes etc and makes provision for certain specialist types of new housing such as accessible and adaptable housing, accommodation for older people, self-build and custom housing etc. but not home-working or live/work units. The WPC would like to see these included.

Included files

Title Housing Delivery

ID EGS15641

Person ID 1271974

Full Name EMILY FORD

Organisation Details SENIOR PLANNER

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Officer Comment	HOUS PWCG
Housing Delivery comment	<ul style="list-style-type: none"> • We support DBC in seeking to deliver a mix of housing types and sizes to meet the needs of all sections of the community, provide a choice of homes and encourage sustainable, inclusive and mixed • It is important to recognise that the nature and location of individual sites can lead to suitability for different types of In this regard, part 4 of the policy, which recognises that housing mix may vary between sites, is welcomed. • Croudace recognise the affordability pressures which exist in the Borough and support DBC in seeking the delivery of affordable • We note that paragraph 27 outlines that a target of 35-40% affordable housing has historically been achievable in most locations of the Borough. However, it is important that thorough viability testing is undertaken as part of the preparation of the Local Plan to examine whether all proposed site allocations can viably deliver the target affordable housing quantum and tenure split in combination with infrastructure requirements. • Having regard to the potential for abnormal costs to adversely affect viability on some sites, it is also important that the desire to deliver affordable housing is balanced with viability considerations when judgements on the level of affordable housing to be provided are • We note that paragraph 60 of the Plan identifies an annual demand for over 70 custom and self-build homes in the Borough, compared to a supply of approximately 30 homes a year. This figure is used as the justification for requiring 5% of plots on sites with 40 or more homes.

- Whilst the principle of enabling custom and self-build is supported, it will be necessary to consider the feasibility and viability of sites providing the intended quantum of self-build housing and whether such housing could be better provided on specific sites for custom and self-build. Such testing should be undertaken as part of the preparation of the Regulation 19 stage Local Plan, alongside the further analysis of the appropriate threshold for provision noted in paragraph 14.61. It should further be recognised that paragraphs 57-024 and 57-025 of the Planning Practice Guidance set out a variety of approaches that need to be considered in the delivery of self-build plots, including the use of the Council's own land.
- We recommend that Policy DM8 is amended to provide greater clarity as to the application of this policy suggesting that due consideration is given to the provision of custom and self-build rather than imposing a fixed To this end, we recommend the following amendment:

1. due consideration should be given to the provision of should be made available on site, having regard to the suitability of the site for self and custom build plots and viability of development. The provision will take account of the viability of the development.

- We would also recommend the policy sets out more detail on the application of the policy to ensure flexibility in the event that identified self build plots are not delivered and should be returned to the
- We support the intention for densities to be informed by site-specific Whilst we agree that acceptable densities for allocated Growth Areas could be guided by Masterplans/Design Codes, there is a need for flexibility in these documents so as to enable development which responds to individual site constraints and opportunities, as well as market demand, to be brought forward. To this end, Masterplans and Design Codes should avoid being overly prescriptive.

It is recognised in DBC's Housing Topic Paper that further work is required to justify the adoption of space standards and this is welcomed. If the policy continues to be justified we would request the Council include some degree of flexibility in the application of standards to ensure homes can be delivered to meet a specific need in the community.

Included files	
Title	Housing Delivery
ID	EGS15669

Person ID	1272282
Full Name	Plato Estates
Organisation Details	c/o DLP Planning
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	SUP - HOUS
Housing Delivery comment	<ul style="list-style-type: none"> We support the Council's ambition set out in paragraph 14.1 to <i>“ensure that Dacorum's communities have genuine access to a wide range and high quality of homes and other specialist forms of accommodation by planning for a sufficient quantity, quality and type of housing in new schemes”</i>.
Included files	
Title	Housing Delivery
ID	EGS15670
Person ID	1272282
Full Name	Plato Estates
Organisation Details	c/o DLP Planning
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	<ul style="list-style-type: none"> We note in Policy DM1 ('Mix of Housing') the requirement for developments of 10 or more homes to include <i>“a mix of housing types and sizes to meet the needs of all sections of the community”</i>, including <i>“accommodation for older</i>

people”. Planning Practice Guidance (PPG) (Reference ID: 63-010-20190626) identifies four main types of specialist housing for older people, including,

- 1 age-restricted general market housing,
- 2 extra care housing or housing-with-care,

- retirement living or sheltered housing, and
- 1 residential care homes and nursing
- It is currently unclear how each of these forms of housing would be brought forward on development sites through Policy In particular, there does not appear to be a mechanism for ensuring delivery of sufficient residential or care home provision as these cannot simply be delivered as a proportion of housing units.
- Policy DM1 should be revised to make clear how specialist forms of accommodation, including residential care homes and nursing homes, will be delivered through the Dacorum Local Plan. It is unlikely that sufficient specialist older persons accommodation will be delivered through speculative development and therefore in order to be ‘positively prepared’ the Plan should identify specific, deliverable sites for these forms of accommodation.

Included files	
Title	Housing Delivery
ID	EGS15671
Person ID	1272282
Full Name	Plato Estates
Organisation Details	c/o DLP Planning
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ - HOUS
Housing Delivery comment	<ul style="list-style-type: none"> • We broadly support the objectives of Policy DM9 (‘Housing for Older People’) which seeks to support the development of specialist housing for older However, whilst paragraph 2 of Policy DM9 states that some of the Growth Areas have specific requirements for the inclusion of an element of housing for older people, there is no clear mechanism for how other forms of specialist accommodation, particularly residential care or nursing homes (C2) will be delivered other than stating that they will be ‘encouraged’ (Policy DM9, paragraph 3).

- In order to demonstrate that the plan has been positively prepared (in accordance with NPPF paragraph 35) and to ensure that older persons' accommodation needs are met through the plan period, we suggest that the plan should allocate specific sites for older persons' The site our client is promoting to the east of Cow Roast is one such site that we believe should be allocated for residential care home (C2) use as it meets the requirements of Policy DM9, paragraph 3 by being a *“suitable and well located”* site, as further discussed in Section 6 of this report.

Included files

Title Housing Delivery

ID EGS15675

Person ID 1272282

Full Name Plato Estates

Organisation Details c/o DLP Planning

Agent ID

Agent Name

Agent Organisation

Yes / No
 * Yes
 * No

Officer Comment OBJ – HOUS, HGC, BER, TRI

Housing Delivery comment

- In respect of planning for the housing needs of older people, Planning Practice Guidance (Reference ID: 63-001-20190626) states:
“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing...Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.”
 - However, this need to provide housing for older people is not being adequately met through the Local Plan as it currently stands.
 - Whilst there are references to older persons' accommodation being delivered through the South Berkhamsted Growth Area (paragraph 109) and East Tring Growth Area (paragraph 23.163), there is no reference to older persons' accommodation within the wording of Policy SP21 ('Delivering Growth in South Berkhamsted). As such there is currently no policy requirement for this to be delivered as part of a future development scheme in South Berkhamsted. It is also unclear what scale or type of older persons' accommodation is expected to be provided on this development site. As such, the Plan as currently drafted is not positively prepared.

- There is also reference to Growth Area HH01 (North Hemel, Phase 1) being allocated for “around 1,550 homes (including provision for older people)”, but again there is no specification of what scale or type of older persons’ accommodation is expected to be provided and this is not set out in the policy
- As stated in paragraph 9 above, there is a need for 1,348 additional care home bedspaces in Dacorum Borough by 2036 (see report attached at Appendix 1) and it is unclear how these will be delivered through the Local Plan.
- In order to demonstrate that it has been positively prepared (in accordance with paragraph 35 of the NPPF) the Dacorum Local Plan should allocate specific, deliverable sites for older persons’ The site to the east of Cow Roast is one such site that we believe should be allocated for residential care home (C2) use, for reasons set out in Section 6 of this report.

Included files

Title Housing Delivery

ID EGS15677

Person ID 1272282

Full Name Plato Estates

Organisation Details c/o DLP Planning

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Officer Comment OBJ - HOUS

Housing Delivery comment

- **INTRODUCTION**
- This report has been prepared by the Strategic Planning Research Unit (SPRU) of DLP Planning Ltd on behalf of Plato Estates
- This report provides an analysis of the current and projected future need for older persons accommodation in Dacorum Borough over the emerging Local Plan period to 2036. It assesses whether the existing supply is adequate to meet current and future needs in the Borough over this

1 The National Planning Policy Framework ('NPPF')

- Chapter 2 sets out the core introductory principles for “Achieving sustainable development”. Paragraph 8b sets out the social pillar of sustainable development:

2 *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations;*

- Paragraph 15 of the Framework states that the planning system should be genuinely plan- Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities. It is indisputable that provision for older persons’ needs is a social priority, and Government expects this to be addressed now, through up-to-date plans.
- Paragraph 20 further identifies that “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for (a) housing (including affordable housing)*”. Paragraph 23 in turn requires strategic policies 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 should include planning for and allocating sufficient sites to deliver the strategic priorities of the ”*
- Paragraph 31 sets out that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market
- Chapter 5 is entitled: Delivering a sufficient supply of The Chapter, read as a whole, makes clear that a “*sufficient supply*” is not merely quantitative in character, but has a qualitative character. National policy envisages that housing of the right type is brought forward to assist a range of different groups within the community.
- Paragraph 59 states that in order to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are
- Paragraph 61 explicitly identifies that this should include the needs of older people. As set out below, the detail for how this should be addressed is set out in the Planning Practice
- The Framework, within the glossary section at page 69, provides the definition of Older It now includes those approaching retirement as well as those already retired:

“People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”

- The Planning Practice Guidance is split into several chapters, the two most relevant to the consideration of older persons’ housing needs are Chapter 2a – Housing and Economic Need Assessment and Chapter 63 – Housing

for Older and disable Chapter 2a sets out the broad context for housing needs assessment and Chapter 63 is a later addition, which

sets out the specific approach. Consistent with NPPF Chapter 5, paragraphs 59 and 61 (cited above), the two Chapters should be read together.

- Paragraph 001 (Reference ID: 2a-001-20190220) defines housing need to be:

An unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this...

- Paragraph 002 (Reference ID: 2a-002-20190220) then goes on to set out that a standard methodology should be used for assessing local housing needs and that this standard method uses a formula to identify the minimum number of homes expected to be planned for in a way which addresses projected household growth and historic under-supply.
- Furthermore, paragraph: 003 (Reference ID: 2a-003-20190220) states that, whilst acknowledging the standard method is not mandatory, it is only through a local plan examination where an alternative approach can be set out and that the alternative method will be used only in exceptional circumstances. Outside of a local plan examination the standard method must be used until there is an up-to-date strategic policy in place to quantify the housing requirement of the Plan
- Paragraph 004 (Reference ID 2a-004-20190220) sets out the calculation used in the standard method and contains several worked examples. The most relevant part of the calculation for this present appeal is “Step 1 – Setting the baseline”. Within this Step the 2014-based household projections are expressly identified for use as the A hyperlink to their location online is expressly provided. Within the section for the 2014-based household projections, is the methodology used to calculate them. I will consider the detailed text of this methodology document later in my proof at Chapter 6 below.
- Paragraph 005 (Reference ID:2a-005-20190220) sets out that the 2014-based household projections should be used in the standard method as they provide stability for planning authorities and communities, ensuring that historic under-delivery and declining affordability is reflected and to be consistent with the Government’s objective of significantly boosting the supply of
- Paragraph 015 (Reference ID: 2a-015-20190220) establishes that using the 2016-based (and by extension the 2018-based) household projections will not be considered to be following the standard method as set out in the Furthermore where an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound, when tested at examination.
- Paragraph 017 (Reference ID: 2a-017-20190722) sets out there is separate guidance for identifying housing needs of older and disabled I do not read the word “separate” as indicating that Chapter 2a can simply be ignored. On the contrary, the correct approach is to read the two Chapters together.
- The intention underlying the current standard method is made clear by central Government in the consultation on Changes to the Current Planning Paragraph 11 states:

“11. The Government introduced the standard method to make the process of identifying the level of need in an area simple, quick and transparent. The standard method is designed to cut this time and ensure that the plan-making process focuses on how and where the homes can best be built, how they can be best designed and how the infrastructure can be aligned rather than time-consuming debates about the number of homes. The Government is clear that the standard method has an important role in achieving these ends and that it should continue to be: an easy and transparent process for people to understand; based on publicly available data; and reflect the need for homes in an area by taking in account the affordability of homes locally.”

- The clear intention of national policy, as expressed in the guidance, is that where a baseline is chosen this should be one that uses the 2014-based
- Chapter 63 was published on 26 June The Chapter gives effect to the NPPF paragraphs 59 and 61, identifying the particular importance in national policy terms of providing housing for older people.
- Paragraph 001 (Reference ID:63-001-20190626) states the following:

The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million.

Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.

- Paragraph 003 (Reference-ID: 63-003-20190626) establishes that local authorities must determine the needs for people who will be approaching or reaching retirement age over the plan period, as well as the existing population of older people. This provides a clear distinction between existing needs and future
- Paragraph 004 (Reference ID: 63-004-20190626) refers to the evidence which can be used when identifying the housing needs of older people. It states that census data, population and household projections by age group can be used. Needs split by tenure can also be assessed, referencing the SHOP@ online toolkit. Evidence from Joint Strategic Needs Assessment can also be It is also stated that the assessment of need can set out the level of need for residential care homes.
- Finally, in Paragraph 010 (Reference ID: 63-010-20190626) the different types of specialist housing for older people are The type relevant to this appeal is Residential care homes and nursing homes, which is defined as:

“These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.”

- Provided below is a summary of relevant reports prepared by Government, Parliament and Industry which collectively show that the need to provide adequate housing for older persons in general, and specifically care home provision,

has been considered a long-standing national issue and is part and parcel of the housing crisis experienced in the UK for a prolonged period of

- The wider housing crisis has failed to adequately provide for an ageing population, which in turn has had consequences within other parts of the housing market, creating an intergenerational imbalance. This is often typified by older households living in houses too big for their current needs and needs to be corrected by 'right sizing'. The ability for older households to do this is driven by the availability of adequate housing, suitable to their changing needs, of which care home provision is Government's response to this has been to bring forward new policy and guidance in an attempt to address the failure to increase this specialist supply. However, as set out in the report jointly prepared by Irwin Mitchell and Knight Frank, Local Planning Authorities are still failing to respond to this crisis.
- The report 'Housing our Ageing population: Positive Ideas, Making Retirement Living A Positive Choice' report was published in 2016 by the All-Party Parliamentary Group on Housing and Care for Older People. HAPPI 3 sets the current context for older persons housing in the UK. It is the third in a series of reports which have looked at different issues facing older persons housing HAPPI 3 looks at the hidden reasons why older people may, or may not want to move home.
- The recommendations of the report are set out on page 6, of relevance to this appeal are those concerning Local Government: recommendation 1 *Councils need to ensure their Local Plan gives the necessary priority to older people's housing needs* and recommendation 4 *house-building and Council support for development can free up affordable, under-occupied family homes...achieving solutions for both younger and older*
- Looking at the market trends and comparisons to similar countries, the report notes that just 1% of Britons in their 60s live in tailor-made retirement properties, compared to 17% in the US and 13% in Australia and New Zealand and that homes built specifically for older people has fallen from 30,000 in the 1980s to fewer than 8,000 in recent years. It should be noted that this covers all types of accommodation as the report considers as 'retirement housing' from general housing to residential care Reports prepared by Savills and Jones Lang LaSalle, which are referenced in the HAPPI 3 report point towards chronic shortages of high quality housing, and that by 2025 there is an estimated need for 725,000 care home spaces needed to meet demand, and that 11,000 such homes would be needed to sustain the projected 2% annual increase in the number of people aged over 65.
- This report looks at the role of social care and the growing demand for Care Homes in At page 4, it sets out that the Social Care and Care Home sector is an integral part of the British Service Economy and that the care home market for over 65s does not follow a prescribed model and that the sector is relatively fragmented offering a varied mix of businesses who operate in the sector, from small to large businesses, charities and not for profit organisations. Furthermore on page 5, it sets out that the self-pay market is growing at a faster rate than the state paid option – a trend which is likely to continue.
- At pages 6 and 7 of the report it is stated that the proportion of over 85+ population in residential accommodation has decreased from 2% in 1996 to 14.8% in 2017, however it should be noted these are proportional figures and not absolute. A likely driver for the proportional decrease in persons living in care homes will be reductions in local authority budgets. This same period of time also saw increases in the growth of NHS admission for the elderly, coupled with delays in discharge – due to the unavailability of suitable social care, or funding disagreements. This

has a significant impact on NHS resources. This is partly a consequence of the local authority resource constraints. This sets out the wider context for the need to invest in the Care Home sector in England.

- Page 9 of report, a national projection is set out, which considers that at least 75,000 additional elderly care beds are needed by 2030 and that based on recent trends, demand will outstrip supply by
- This Report was prepared by Government, in 2018, in response to the Select Committee Inquiry into Housing for Older People. The introduction to the report, clearly sets out the context of older persons housing needs and the benefits that it can

As the Committee recognised, we have a rapidly ageing population. The needs of older people now are different from previous generations and their aspirations around housing and lifestyles have changed dramatically... In that [the Fixing Our Broken Housing Market, White Paper] we acknowledged that offering older people a better choice of accommodation can help them to live independently for longer, improve their quality of life and free up more family homes for other buyers. We recognise that ensuring the right and adequate housing for older people can reduce costs to the social care and health systems.

- It is clear that Government's priority was (and remained) to ensure the right type and adequate number of homes for older people are built and that the needs of the rapidly ageing population are met. This emphasis was then translated into the updated Planning Practice
- The House of Lords Select Committee published its report on intergenerational unfairness in April 2019. This considered a range of policy making implications resulting from the rapidly aging population, including consideration of planning and housing
- One of its key findings concerned housing provision and it finds that although the Government states that housing supply is one of its priorities, it is still not doing enough to address this problem. This is an issue for all housing types and specific consideration was given to older persons housing which will be needed to house the aging
- The report found that only 11 per cent of Local Plans in England and Wales have specific policies to address older people's housing needs, with only four per cent of plans including land allocations for housing for older people. This was despite the expectation that 30 per cent of the population will be over 65 by 2036 (para 111).
- The report found that under the NPPF local authorities are supposed to consider the needs of older people in their area, but that this had not happened yet because we "are in a transition phase on planning." (para 111). However, it stated that it was clear that the new NPPF, updated in February, aimed to change
- It found that local authorities who fail to consider the needs of older people has not historically led to a Plan being found unsound under the NPPF 2012, however the new NPPF and PPG were seen as providing the mechanism to rectify this in the future. I consider that this report along with the Government response to the select committee inquiry into Housing for Older people, led to the change in the Planning Practice Guidance considered above in Chapter
- This report, jointly prepared by Irwin Mitchell and Knight Frank, is an update to a report from 2018 which looked at how well local plans provided for the needs of the Country's ageing The report looks to see how much improvement

has been made from the lowest- graded authorities (those graded as D in 2017). Of those rated D in 2017, 72% remain in that category.

- Using the simple grading of A to D, the 2017 reported that 62% of authorities had no adequately clear planning policy or site allocations to meet needs. In 2017 Bracknell Forest was one of those local authorities rated as D and has since moved to be graded as C. To achieve a C grade status, the requirement is simply to have allocations. The quantum of these or whether they meet need is not factored into the grading system. It is clear from the assessment of need by the appellant and Council, those allocations were insufficient as there remains a significant provision of un-met
- The commentary, on page 6, within the report, succinctly summarises this report and the continued failings of the planning system, identified in Chapters 4 and 5:

Our findings are evidence of the appalling failure of local authorities to plan for such a demographic shift, which isn't only foreseeable, but has been foreseen and commented on.

1 Emerging Local Plan

- The emerging Dacorum Local Plan (2020-2038) Policy SP4 'Delivering The Housing Strategy' sets out the Plan's overall housing target:
 - 1 *The Plan will deliver a minimum of 16,596 net additional homes across the Borough over the period 2020-2038.*
- Policy SP4 also sets out the approach to overall needs for specialist The policy addresses the needs for older persons accommodation in paragraph 2:

1 *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.*

- The latest Local Housing Needs Assessment (LHNA) was produced by GL Hearn in September 2020. It is noted that the 2020 LHNA purports to have been prepared in accordance with the adopted Standard Method for calculating Local Housing Needs (LHN), while the proposed housing target of 16,596 dwellings (2020-38) (922 dpa) set out in Policy SP4 aligns with the proposed changes to the Standard Method which were consulted on by Government in August 2020 but were never
- In December 2020 the Government subsequently adopted alternative changes to the Standard Method, which do not alter the LHN figure for Dacorum (1,023 dpa). Therefore, the proposed housing target in Policy SP4 does not align with the findings of the 2020 LHNA and the policy is not consistent with
- However, the 2020 LHNA does not consider that in South West Hertfordshire there are the exceptional circumstances to plan for a lower level of housing Therefore, the proposed housing target in Policy SP4 does not conform with PPG and will need to increase to reflect the LHN as calculated by the Standard Method is the minimum target.
- Adopting a housing target in line with the LHN using the Standard Method would bring Policy SP4 into alignment with the LHNA insofar as they would both be prepared on the basis of delivering the same level of housing (1,023

dpa). This notwithstanding, there are issues with the methodology used in the LHNA to estimate the housing needs of older persons, which are set out

- The Council's evidence is set out in the 2020 LHNA. For Dacorum, the LHNA identifies a current demand for 1,980 units of retirement housing (incorporating housing with support and housing with care) against a current (2018) supply of 1,942 units, indicating a small current shortfall of 38 units. This is projected to increase by an additional 1,153 units by 2036 indicating **a total requirement for 1,191 additional retirement units over the Plan period.**
- For care homes, the LHNA shows a current demand for 1,226 bedspaces against a current (2018) supply of 921 bedspaces. This indicates a larger shortfall of 305 spaces. Demand is projected to increase by a further 714 over the period to 2036 resulting in **a total requirement for 1,019 new care home bedspaces over the Plan period.**

Chart 1: Dacorum Supply and Demand of Older Persons Housing – LHNA Figures

Current supply

2020

demand

Current shortfall

Additional demand to

Shortfall/ surplus by

(2018)

2036

2036

Retirement Housing

1,942

1,980

38

1,153

1,191

Care Homes

921

1,226

305

714

1,019

Source: LHNA Table 90 and 96

However, there are some significant issues with the approach taken by the LHNA to derive these figures. The following sections provide a critique of the LHNA's approach to calculating older person's housing need. A summary of this critique is set out below.

- There are four consecutive stages to calculating specialist older persons' need accommodation:
 - 1 The population over 75 years in 2020 (when applying the rate in Stage 3, this gives the number of bedspaces required for the population immediately)
 - 2 Projected population growth between 2020-36 (when applying the rate in Stage 3, this gives the number of bedspaces required for the population growth up to 2036)
 - 3 The assumed proportion of the population 75+ needing residential/ nursing care (the prevalence for older persons to need specialist housing)
 - 4 The number of existing and pipeline bedspaces (what space is available now to meet immediate needs and what is in the pipeline to meet future needs)
- In the LHNA the ONS projections have been rebased to a starting date of 2020 using reasonable assumptions and data from Mid-Year Population Estimates (MYE), and the first few years of the While it is recognised that there is now new data available (e.g. new MYE data) these assumptions look reasonable and will have limited effect.
- The LHNA takes the following approach to calculating population growth in Dacorum:
- The LHN is calculated using the Standard Method which uses household projections and an uplift to improve affordability to calculate
- In Dacorum the LHN is 40% higher than the household projections, so there is a need to estimate who will occupy these additional
- The number of additional households required to fill the additional 40% can be drawn from two main sources:
 - 1 The existing population, currently living in the district but currently occupying larger households (e.g. adult children living with parents), being able to form new households, and
 - 2 Increased in-migration from outside the
- However, the LHNA modelling (Table 124) shows that the additional 40% in Dacorum will be entirely due to increased in-migration.

- Dacorum's future population is then calculated by increasing the level of in-migration (in accordance with the migrant population profile) until the additional 40% of households are
 - There are a number of fundamental and detailed problems with this approach:
- The Standard Method includes an uplift to improve affordability – 40% in Dacorum's case – to ease affordability pressures in areas where these are most acute. However,

the LHNA approach transfers all of this uplift into increased in-migration. This means more people moving into Dacorum, not more housing to improve affordability for Dacorum residents.

- There is no explanation of where this level of increased in-migration will come from. If this approach is taken by all of the HMA authorities – as the LHNA advocates – then this means a large amount of in-migration coming from beyond the HMA. If this approach is taken by all local authorities in England – all are required to use the Standard Method except for in exceptional circumstances – then this means a large amount of in-migration coming from the other nations of the UK or internationally. These assumptions are considered on a consistent national basis in the official ONS projections but are not considered by the modelling in the LHNA which are not
- The LHNA approach means the scale of projected in-migration is a simple output of the model. It is whatever is required to reach the LHN number. It is not informed by trends and the LHNA does not include any testing to see whether the scale of increased in-migration resulting from the modelling is reasonable or realistic. For Dacorum, it is
- It doesn't account for the growth in the institutional population aged over 75 which will result from the aging of the much larger projected
- The LHNA uses an average of four prevalence rates, only one of which is adopted by Housing LIN, albeit this is now rather. However, two of the LHNA scenarios have been adjusted downward due to slightly lower levels of disability in the older person population. However, this is not corroborated by data in the LHNA and our analysis shows this will not lead to a lower need for specialist older persons accommodation. On the contrary the evidence shows that there is a higher rate of bed blocking in Hertfordshire due to a lack of available care home and nursing home provision.
- This means these two scenarios have been downward adjusted in the LHNA without justification and will not provide a reasonable assessment of the needs of older persons accommodation in
- The fourth model provides a supply-led scenario on what scale of provision is likely to be realistically achieved, and while this is certainly a useful tool, it is not the same as providing an overall assessment of
- The LHNA approach of taking an average of these four models, granting them equal weight and validity, has resulted in the use of unrealistically low prevalence rates that will not reflect the true need for specialist older persons accommodation per head of the 75+ population in Hertfordshire and

- Given the lack of robustness of the analysis regarding prevalence rate adjustments in the LHNA, it is considered that the most robust approach to calculating older persons needs is to disregard these alternative scenarios, and base the analysis on the unadjusted SHOP@ rates as recommended by
- The existing supply of accommodation has been assessed in the LHNA using a baseline position dating from 2018. It is understandable that this always has to be a snapshot in time at the date that the study was prepared. A more up to date supply assessment has been provided as part of this assessment, it shows that there have been a small number of additional units / bedspaces added to the supply since 2018 but this does not significantly

affect the analysis.

- The LHNA calculates the population growth resulting from the delivery of the LHN calculated using the Standard Method. The LHNA then calculates the projected population growth which aligns with the LHN figure. This population growth is then used to calculate specialist housing needs, such as the housing needs for older persons.
- The LHNA uses the Standard Method to identify the overall LHN:
 - Step 1 – The baseline – This is set using the 2014-based household projections produced by ONS. This shows an average annual increase of 731 households per annum (2020-30).
 - Step 2 – Affordability Adjustment – Affordability ratio (2018) of 3 gives an adjustment factor of 52%
 - Step 3 – Capping – Set at 40% above the baseline, which gives a LHN for Dacorum of 1,023 dwellings per annum
- PPG (Paragraph: 005 Reference ID: 2a-005-20190220) sets out that the 2014-based Household Projections should be used as the baseline for the standard method:

“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure 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.”

- The 2014-based Household Projections are fundamentally aligned to the 2014-based Standard Method. The methodology used to produce the household projections is shown in the diagram below. The projections model the following elements:
 - Population – the Sub-National Population Projections (SNPP)
 - Household Population – the population which form household units
 - Institutional Population – the population which do not form households, including residents of care
 - Household Representative Rates (HRRs) – the rate at which the population forms households
 - Household growth – the output which directly feeds into the Standard Method
- The diagram below shows how these factors are linked.

Figure 1. Household projections methodology for England

Source: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/householdprojectionsacrosstheukuserguide#household-population-projections-and-communal-establishments>

- Accordingly, the 2014-based Household Projections and inextricably linked to the corresponding 2014-based Population Projections, Institutional Population Projections, and Household Representative
- Therefore, in order to reflect the Standard Method for calculating LHN as set out in PPG these various projections should be used. Using these projections for calculating older persons needs ensures consistency and reflects Government's clear intention in respect of the calculation of housing
- The first step in the calculation, once LHN is derived, is to estimate the number of households who will occupy the new dwellings. The number of additional households will be drawn from two sources: firstly, the additional households shown in the 2014-based household Secondly, the additional households required to fill the additional 40% affordability uplift as required by the Standard Method for Dacorum. These additional households can be drawn from two main sources:
 - 1 The existing population, currently living in the district but currently occupying larger households (e.g. adult children living with parents), being able to form new households, and:
 - 2 Increased in-migration from outside the
 - The LHNA for South West Herts models an approach which draws on both of these sources to model the additional This is justified in the SHMA:
 - *If it is assumed that the adjustment fills these homes with just the indigenous population, who previously were unable to form households, **this would result in unprecedented levels of household formation**. This would result in greatly reduced household sizes e. very many single persons households. However, there is no indication such levels are desired.*
 - *If it is assumed that all the homes are to be filled with increased migration **this would not allow for improvements to local household formation rates**. There is also an issue in that drawing a population from another area would result in a decreased need in the area from which they have moved. **However, the standard method does not reflect this logic and that potential issue remains unresolved.***
 - *As set out in Figure 3 our approach is to make reasonable adjustments (improvements) to household formation rates with the remainder of the additional homes assumed to be occupied by further in-migration. In relation to alternative approaches to household formation rates, a scenario has been derived which is a mid-way point between the 2014-based HFR and the pre-recession 2008-based (para 2.33-2.35)*
 - We have added emphasis on three sentences which are problematic.

- The first of the above sources (newly forming households from the existing population) is modelled via increasing the household representative rate (HRR) for younger households. This is done by adjusting the 2014-based SNHP HRR to a part return to trend seen in the 2008
- However, for Dacorum the modelling shows that this adjustment does not increase the household formation. LHNA Table 124, from which the figures for Dacorum are replicated below, shows that with a constant population growth, the LHNA's 'part return to trend' HRR adjustment actually results in smaller level of household growth than the unadjusted 2014 - based
- The impact of this adjustment for Dacorum is virtually negligible, and as shown in Table 124, when converted into a dwellings per annum figure, the HRR adjustment in the 'Part-return to trend' scenario makes no difference to the baseline 2014-SNHP on which it is

Source: LHNA Table 124

- This approach does not allow for improvements to local household formation rates in Dacorum and the adjustment does not provide an effective increase to household
- It means that in Dacorum the LHNA expects additional households to come entirely from increased levels of in-migration. This is clearly not the purpose of the affordability uplift in the Standard Method which is aimed at easing housing affordability pressures not increasing in-
- The affordability uplift in the Standard Method is specifically higher in areas with worse levels of housing affordability because these areas need greater levels of housing delivery relative to their population growth in order to ease these By attracting greater levels of in- migration this will not happen in Dacorum. (However, it might ease affordability in other areas where these new arrivals are out-migrating from).
- The LHNA then uses the household formation rate to calculate the population arising from the delivery of dwellings in-line with the LHN of 1,023 dpa (including a small vacancy rate). It calculates this would result in a growth in the population of 1,983 persons per This is shown in the table below.

Chart 2: Dacorum Population – LHNA Projection

2020

2036

2020-36

Per Annum

Under 16

32,304

36,115

3,812

238

16-64

97,163

112,744

15,582

974

65+

27,411

39,742

12,330

771

Total

156,878

188,601

31,724

1,983

Source: LHNA Table 7

- The LHNA contains a section (from para 27) on how the projected population growth has been calculated to align with the Standard Method figure of 1,023 dwellings. This explains:

The 2014-based household projections are used as the starting point (step 1) of the standard method and these are based on the 2014-based sub-national population projections (SNPP) (LHNA, para 2.29)

- Their infographic then goes on to explain how the excess houses are filled, suggesting that it infills the difference between the population shown in the 2014-based SNPP and the population implied by the Standard

- However, this is not what the GLH modelling shows. The GLH modelling shows the difference between the population shown in the 2016-based SNPP and the population implied by the Standard Method. This is explained in the LHNA appendix A:

Therefore, in moving the analysis forward, it is suggested that the most suitable approach is to maintain the 2016-based SNPP as a baseline projection and amend migration estimates so that the level of need matches that shown in the Standard Method (for 4,043 dwellings per annum across the study area). Further adjustments are made to the household formation to ensure a consistent projection with the LHN. (LHNA, Para A1.17)

- The GLH modelling therefore uses a completely different baseline to the Standard Method. The LHNA provides the following justification for using the 2016-based SNPP instead of the 2014-based SNPP:

As noted previously, the Government has amended the Standard Method so that the 2016-based SNPP are disregarded in favour of using the 2014-based version as a start point.

There is some good logic for this as the 2016-based [household] projections do seem to potentially be building in an additional suppression of household formation (discussed below), however, it is considered that the 2016-based SNPP (i.e. the population data) should not be so readily disregarded – this is particularly because of the changes made to

fertility and mortality rates which reflect observed recent trends. (LHNA, Para A1.16)

- This approach ignores the fact that the 2014-based SNPP feeds into the 2014-based Household Projections which should be the starting point for calculating housing needs as set out in PPG. Government has made it explicitly clear that the 2016-based projections (or other projections) do not provide an appropriate basis for calculating housing needs. The LHNA approach uses the 2014-based projections for calculating overall housing needs (LHN) but then uses the 2016-based SNPP in its calculation for assessing population growth from which it derives the specialist housing. This is illogical and contrary to PPG.
- This is problematic because the 2016-based SNPP shows considerably lower growth than the 2014-based SNPP. The table below shows the outputs of the population projections (SNPPs) with the Household Representative Rates (HRRs) for each of the projections. This shows the 2014-based SNPP is higher, whichever HRR is applied.
- It also shows that both projections are considerably lower than the 16,368 dwellings (1,023 dpa x 16 years) required in Dacorum by the Standard Method over the period 2020-36. This means that there is greater backfilling required to get to the population aligned to the Standard Method if the 2016-based SNPP is used as a baseline than if the 2014-based SNPP is

Chart 3: Projected Household Growth – Dacorum 2020-36

2014-based HRR

2016-based HRR

2014-based SNPP

11,364

9,277

2016-based SNPP

9,052

8,441

- The approach to calculating LHN using the Standard Method is shown in Figure 2 below. The LHNA approach to calculating
- It is noted that there is no discussion in the LHNA of the 2018-based SNPP within the analysis, despite these being released in March 2020 and would therefore represent the most up to date population projections released six months prior to the publication of the LHNA in September
- Our view is that PPG is clear that it is the 2014-based projections, rather than the latest projections (as per previous iterations of the guidance) which should be used for planning. However, the LHNA argues that the 2016-based SNPP should be used particularly because it reflects observed recent trends. But simultaneously the LHNA makes no reference to the more recent iteration of the projections – the 2018-based SNPP. It appears the basis for using the 2016-based SNPP is either unjustified or out of date.
- While we do not advocate the use of the 2018-based SNPP, for the same reasons that the 2016-based SNPP should not be used, we have included it in our analysis below as it is instructive to highlight the problem with the LHNA approach of infilling to a different baseline to the Standard
- The tables below set out population projections for Dacorum by ONS from the 2014-based, 2016-based, and 2018-based

Chart 4: Dacorum Population – 2014-based SNPP

2020

2036

2020-36

Per Annum

Under 16

30,328

32,428
2,100
131
16-64
98,291
106,691
8,400
525
65+
27,444
39,744
12,300
769

Total
156,063
178,863
22,800
1,425

Chart 5: Dacorum Population – 2016-based SNPP

2020
2036
2020-36
Per Annum
Under 16

30,428

30,428

0

0

16-64

98,191

102,791

4,600

288

65+

27,344

38,144

10,800

675

Total

155,963

171,363

15,400

963

Chart 6: Dacorum Population – 2018-based SNPP

2020

2036

2020-36

Per Annum

Under 16

30,294

28,092
-2,202
-138
16-64
97,918
98,202
283
18
65+
27,297
36,337
9,039
565
Total
155,510
162,631
7,121
445

- A comparison of the total population growth shown in the three ONS population projections and the LHNA population projection is shown in the table

Chart 7: Comparison of Projections

2020

2036

2020-36

Per Annum

2014-based SNPP

156,063
 178,863
 22,800
 1,425
 2016-based SNPP
 155,963
 171,363
 15,400
 963
 2018-based SNPP
 155,510
 162,631
 7,121
 445
 LHNA Projection
 156,878
 188,601
 31,724
 1,983

- The LHNA then backfills the difference between the SNPP and the LHNA projection. This difference is accounted for by increasing the quantum of in-migration.
- The 2014-based SNPP is closest in scale to the LHNA projection, accounting for 72% of projected population growth. It therefore requires the smallest level of backfilling. The 2016- based SNPP shows just under half (49%) of the growth required by the LHNA projection, and therefore backfilling will constitute the majority of the growth. The 2018-based projection is smaller still showing only 22% of the LHNA projection and therefore would require 78% of growth to be via

Chart 8: Difference Between SNPPs and LHNA Projection for Dacorum, 2020-36

Population 2020-36

LHNA

Projection

% of LHNA

Projection

Backfill Required

Backfill % of LHNA Projection

2014-based SNPP

22,800

31,724

72%

8,924

28%

2016-based SNPP

15,400

31,724

49%

16,324

51%

2018-based SNPP

7,121

31,724

22%

24,603

78%

- Clearly, the further we deviate from the 2014-based SNPP as the baseline, by using the other SNPP (or any other unrelated projection) for the baseline, then the greater proportion of population growth will be due to backfilling via increases to the levels of in-migration.

- These increases to the levels of in-migration used in the LHNA modelling are not based on any empirical data. It is simply a modelled output of delivering the Standard Method. The LHNA does not test whether this output is realistic or identify the source of the increased level of in-migration, be it internal or international in-migration.
- We can consider the implications of the LHNA modelling by comparing them to the components of change of Dacorum's population growth since 2001. This is shown in the table

Chart 9: Dacorum Components of Population Change 2001-2018

Year

Natural Change

Net Migration

Other Change

Total Net Change

2001/02

351

-275

199

275

2002/03

400

-254

149

295

2003/04

509
-547
28
-10
2004/05
335
-230
125
230
2005/06
402
-275
213
340
2006/07
657
-275
172
554
2007/08
699
444
132
1,275
2008/09
699
485
219
1,403

2009/10

724

542

180

1,446

2010/11

859

558

230

1,647

2011/12

711

748

-29

1,430

2012/13

606

722

19

1,347

2013/14

777

614

49

1,440

2014/15

696

619

239

1,554

2015/16

711

681

-16

1,376

2016/17

652

247

-28

871

2017/18

683

228

53

964

10yr Average

712

544

92

1,348

- Other the past ten years the natural change has been relatively constant. And the Other changes has seen fluctuations but accounts for a relatively low proportion of overall
- The table below shows the scale of increase in net in-migration which would be required to achieve the growth shown in the LHNA projection, holding natural change and other changes This shows that it would require **unprecedented levels of in-migration** – an average annual net migration of 1,180 per annum to achieve the projected level of growth. This is more than double (217%) the annual average net migration seen over the past ten years and 158% of the highest recorded year (748 in 2011/12) since 2001.
- It is noted that this is the reasoning used in the LHNA to reject a larger change to the By the same logic this should mean that this approach is rejected to this scale of change to in-migration.

- This compares to the same analysis using the 2014-based SNPP. This shows annual net-migration of 622 persons per This is much higher than has been seen in the last two years, slightly above the average seen in Dacorum over the past 10 years, but is commensurate with the levels seen over the recent past.

Chart 10: Annual Components of Change of Population Projections – Dacorum 2020-36

Projection

Annual Natural Change

Annual Net Migration

Annual Other Change

Annual Total Change

2014-based SNPP

712

622

92

1,425

LHNA Projection

712

1,180

92

1,983

- This shows the approach taken by the LHNA requires a significant increase in the levels of

in-migration. However, the LHNA provides is no explanation of where this level of increased in-migration will come from. If this approach is taken by all of the HMA authorities – as the LHNA advocates – then this means a large amount of in-migration coming from beyond the HMA. If this approach is taken by all local authorities in England – all are required

to use the Standard Method except for in exceptional circumstances – then this means a large amount of in-migration coming from the other nations of the UK or internationally.

- The LHNA does hint at this being problematic – *“There is also an issue in that drawing a population from another area would result in a decreased need in the area from which they have moved. However, the standard method does not reflect this logic and that potential issue remains unresolved.”* However it makes no attempt to resolve or even mitigate this
- The analysis above shows that this issue could, and should be mitigated by sticking, wherever practicable, as closely as possible to the nationally consistent projections unless there are very good reasons not to do
- While the LHNA concluded that the 2016-based SNPP were more robust than the 2014- based SNPP, the fact is their modelling approach then required a deviation of 51% away from the 2016-based SNPP to produce a projection which is much less robust than either of the
- Issues such as internal and international migration flows are considered on a consistent national basis in the official ONS projections but are not considered by the modelling in the LHNA which are not robust. Therefore it is considered that the official SNPP provide a more robust basis for assessing future population growth than the approach used in the
- The Standard Method is calculated using the 2014-based Household projections which are based on the 2014-based Population projections. This has been established by central Government and is clearly set out in PPG. Using a different baseline to calculate population growth (as the LHNA has done by using the 2016-based SNPP) simply means more backfilling is required, taking the modelling further away from ONS’s consistent set of Using the 2018-based SNPP simply makes this situation worse.
- The population projections are split into the related household population and an institutional population (also referred to as a communal establishments (CEs) population). The household population goes on to inform the household The institutional population includes people who do not occupy normal household spaces including care home spaces, which is of relevance to older persons needs assessments. The institutional population do not form ‘normal’ households and therefore does not feed into the household projections.
- For the 2014-based and 2016-based household projections, the assumption is made that the institutional population for under 75s stays constant at 2011 levels (as shown in the Census). And for over 75s the *share* of the institutional population stays at 2011 levels. This is explained in the projections methodology:

The rationale here is that ageing population will lead to greater level of population aged over 75 in residential care homes that would not be picked up if levels were held fixed, but holding the ratio fixed will.

- This means that while the majority of the SNPP feeds into the related Household projections, a fixed number of under 75s and a fixed ratio of over 75s are included in the institutional population
- However, the approach used in the LHNA estimates Dacorum’s projected population growth in terms of the increased number of households required to fill the LHN calculated using the

Standard Method. This approach deals only with the household population and takes no account of the growth in the institutional population.

- However, as noted by ONS in the quote above, the natural ageing of the additional population will lead to greater level of population aged over 75 in residential care homes that will not be picked up if the uplift simply considers the household population
- The LHNA makes no mention of this issue, and the LHNA approach means that while the projected population growth in the LHNA scenario has been increased by 51% there will be a proportional increase in the institutional population as the household population ages. But this has not been accounted for in the LHNA This will have a significant impact on the need for care home provision in Dacorum which has not been accounted for in the LHNA.

- The LHNA uses prevalence rates which are based on the average of several models:
 - Shop@ (online) – this takes the prevalence rates in the online tool from Housing LIN. This is essentially the data as published without any local adjustments
 - Shop@ (adjusted) – this takes the Housing LIN online figures and makes adjustments based on recognising slightly better health amongst the older person population in the area, although evidence for this is not provided in the
 - Shop@ Review (adjusted) – this uses information from the 2016 review into the Housing LIN prevalence rates, although it is acknowledged that this has not been adopted by Housing LIN. The base rates have again been adjusted to take account of health and deprivation, again with no evidence provided;
 - HOPSR (Housing For Older Peoples Supply Recommendations) – this applies the rates published in the HOPSR tool published by Sheffield Hallam University. It is understood that these rates already make adjustments for health and deprivation issues and are therefore used as
- The LHNA then takes a simple average of the four However, this grants equal weight to each of the four models and assumes that each is equally valid, which is clearly not the case.
- Two of the models have been adjusted downward by GL Hearn to take account of “*slightly better health amongst the older person population*” which is unsubstantiated in the LHNA and, as set out below, is unsupported by evidence. This means that the two adjusted scenarios should be considered to hold little weight as they are based on unsubstantiated
- The figures from the 2016 SHOP@ Review have not been adopted by Housing LIN and yet these are included (with a further downward adjustment by GL Hearn) as an equal weight The LHNA also refers to a further Housing LIN report (Housing in Later Life) was published in 2012 and contained a further set of suggested prevalence rates; “*however, these figures were rejected as not being ‘substantiated’ and have not therefore been considered in the*

analysis". It is noted that the prevalence rates in the Housing in Later Life report were considerably higher than those used in the LHNA.

- The HOPSR is a relatively new toolkit which provides data based on data on the level of specialist accommodation delivery achieved in the areas with higher levels of delivery. It therefore reflects a *"realistic and grounded estimates of what levels of supply are possible"* rather than a true projection of future need for these types of
- It is also noted that the HOPSR model does not so much provide prevalence rates but provides future projections of need of older persons accommodation. These projections are based entirely on the 2014-based SNPP. However, this part of the HOPSR analysis has been entirely unrepresented in the LHNA
- The LHNA makes local adjustments to the prevalence rates on tenure requirements on the following basis:

In South West Herts, data from the 2015 Index of Multiple Deprivation suggests that the SW Herts local authorities generally have a low level of deprivation – this points to a higher proportion of specialist accommodation needing to be in the market (leasehold accommodation) rather than rent. This conclusion is also consistent with earlier findings about the current tenure of older person households in the area, although those findings could also be indicating a lack of supply. (LHNA, para 7.43)

- This tenure adjustment is also supported by evidence in the previous sub-section (paras 13-7.23) on the tenure mix of the older population in the HMA.
- With regards to overall levels of provision, the LHNA makes local adjustments to the prevalence rates on the following basis:

Consideration has also been given to overall levels of disability in the older person population; given that these are slightly lower than the national average a small downwards adjustment to national prevalence rates has been made. (LHNA, para 7.44)

- However, the LHNA provides no evidence or data to support this claim and how this relates to the need for older persons *'Overall levels of disability'* is a nebulous term and its not clear how this would relate to the need for specialist accommodation.
- Furthermore, it is not demonstrated how lower *'overall levels of disability'* in Hertfordshire necessitates a lower provision of specialist accommodation. For example, the data in the table below are recorded by Public Health England and do show life expectancy at 65 slightly higher in Hertfordshire compared to the regional and national
- The data below also show the healthy life expectancy – i.e. how many years the average person can expect to live without major health issue – is slightly higher than national average, and higher than the regional average for men but lower for

- The data show that for disability-free life expectancy - i.e. how many years the average person can expect to live disability free – is higher than the national average but below the regional This would on the face of it support the LHNA position that there are lower *‘overall levels of disability’*.

Chart 11: Healthy Aging Indicators

England

East of England

Hertfordshire

Life expectancy at 65 (male)

19.0

19.3

19.5

Life expectancy at 65 (female)

21.3

21.6

21.7

Healthy life expectancy at 65 (male)

10.6

10.6

11.3

Healthy life expectancy at 65 (female)

11.1

11.5

11.2

Disability-free life expectancy at 65 (male)

9.9

10.2

10.1

Disability-free life expectancy at 65 (female)

9.8

10.3

10.0

Source: Public Health England Productive Healthy Ageing Profile, 2016-19

- Higher levels of life expectancy, healthy life expectancy, and disability-free life expectancy simply mean that people continue being healthy later in life but also die later in life. This means their number of unhealthy years might be roughly similar but just occur at an older average ¹
- The table below shows the ages at which the different life expectancies will be reached for different This is simply the figures in the table above plus 65.

Chart 12: Age of Expectancy of Health Indicators

¹ This is explained in Section 5 (Healthy and disability-free life expectancy in the UK) in the ONS report: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/bulletins/healthstatelifeexpectanciesuk/2016to2018>

England

East of England

Hertfordshire

Life expectancy at 65 (male)

84.0

84.3

84.5

Life expectancy at 65 (female)

86.3

86.6

86.7

Healthy life expectancy at 65 (male)

75.6

75.6

76.3

Healthy life expectancy at 65 (female)

76.1

76.5

76.2

Disability-free life expectancy at 65 (male)

74.9

75.2

75.1

Disability-free life expectancy at 65 (female)

74.8

75.3

75.0

- These figures can be used to derive the number of years that an average resident can expect to not be healthy or disability-free at the end of life. This can be calculated by taking the healthy life expectancy from the overall life expectancy. A similar process can be done for disability-free life
- This provides an estimate of the number of years for which the average resident of an area is likely to require some form of additional care, including the need for a higher or lower provision of specialist
- The table below provides the unhealthy / disability years for the three. This shows that in Hertfordshire the slightly higher health life expectancy and disability-free years are offset by the higher overall life expectancy, meaning that on average Hertfordshire residents will have a greater disparity between their disability-free life expectancy and their overall life expectancy. This means they are actually more likely to require age-related disability care – including specialist accommodation provision – albeit slightly later in life on average than elsewhere in England.

Chart 13: Average Number of Unhealthy / Disability Years

England

East of England

Hertfordshire

Unhealthy years (male)

8.4

8.7

8.2

Unhealthy years (female)

10.2

10.1

10.5

Disability years (male)

9.1

9.1

9.4

Disability years (female)

11.5

11.3

11.7

- Public Health England provides data on the number of care home / nursing home bedspaces per head of population, as set out in the table below. This shows the lack of provision in Hertfordshire compared to regional and national For nursing homes, Hertfordshire has less than half the national rate of nursing home provision.

Chart 14: Care / Nursing Home Spaces Comparison

England

East of England

Hertfordshire

Care home beds per 100 people 75+

9.6

9.0

7.9

Nursing home beds per 100 people 75+

4.7

3.7

2.1

Source: Public Health England Productive Healthy Ageing Profile, 2020

- This lack of provision has a distinct and measurable impact on the number of older people waiting to access specialist accommodation. The definition of a Delayed Transfer of Care (DTOC) is when an adult patient from an NHS-funded acute, or non-acute care setting is ready to go home but are still occupying a bed. The purpose of the NHS collecting this data is to improve the services for patients by reducing the situations where people are in hospital longer than they need to be, which has a detrimental effect on their recovery, rehabilitation, and long-term health and This may be particularly problematic for people who are frail or have long-term care and support needs.
- A look at the most up to date statistics available for the 12-month period from March 2019 to February 2020 shows the number of delays on a monthly basis in the delay in transfers of care from a This data is broken down into several categories setting out the reason for the delay, these are: Awaiting Completion of Assessment, Awaiting Public Funding, Awaiting further non-acute NHS care, **Awaiting residential home placement or availability**, **Awaiting nursing home placement or availability**, awaiting care package in own home, awaiting community equipment and adaptations, patient or family choice, disputes, housing patients not covered by care act and other. The two categories most important for this inquiry are awaiting residential home placement or availability and awaiting nursing home placement or availability.
- For the 12-month period assessed, in Hertfordshire there were 35,249 delayed transfers, of which 12,574 can be attributed to awaiting for residential or nursing home placement or availability, this is 36% of the In comparison for England the same analysis shows that 25% of delayed transfers are due to waiting for residential or nursing home placement or availability. This clearly shows that ‘bed blocking’ is a national problem and is particularly prevalent in Hertfordshire.

Chart 15: Delayed Transfer of Care, by local authority area – reasons for the delay

**Total
Awaiting Residential Home
or Nursing Home placement or availability**

Percentage

Hertfordshire

35,249

12,574

36%

England

1,736,167

437,210

25%

- The LHNA uses an average of four prevalence rates, only one of which is adopted by Housing LIN. However, two of the LHNA scenarios have been adjusted downward due to slightly lower levels of disability in the older person. However, this is not corroborated by data and the data provided herein suggests this will not lead to a lower need for specialist older persons accommodation. On the contrary the evidence shows that there is a higher rate of bed blocking in Hertfordshire due to a lack of available care home and nursing home provision.
- This means these two scenarios have been downward adjusted in the LHNA without justification and will not provide a reasonable assessment of the needs of older persons accommodation in
- The fourth model provides a supply-led scenario on what scale of provision is likely to be realistically achieved, and while this is certainly a useful tool, it is not the same as providing an overall assessment of
- The LHNA approach of taking an average of these four models, granting them equal weight

2 <https://www.england.nhs.uk/statistics/statistical-work-areas/delayed-transfers-of-care/>

and validity, has resulted in the use of unrealistically low prevalence rates that will not reflect the true need for specialist older persons accommodation per head of the 75+ population in Hertfordshire and Dacorum.

- Given the lack of robustness of the analysis regarding prevalence rate adjustments in the LHNA, it is considered that the most robust approach to calculating older persons needs is to disregard these alternative scenarios and base the analysis on the unadjusted SHOP@ rates as recommended by
- As set out in Section 4, the most robust approach for estimating future population growth in alignment with the Standard Method, is to simply use the 2014-based SNPP which underpins the household projections used in the Standard Method
- The 2014-based SNPP provides a robust, transparent, and consistent basis for assessing future population growth across the country which aligns with the methodology for assessing LHN set out in This projection has consistently been cited by national Government has the most appropriate basis for planning for future housing needs.
- This section sets out the changes in population and specialist older persons housing requirements shown using this population
- To calculate the population figures for Dacorum for 2020 the latest (2019) Mid-Year Population Estimates from ONS have been used and have been rolled forward by one year using data from the 2014-based This is shown in the table below.

Chart 16: Population Growth, Dacorum 2020-36

2020
2036
2020-36
% Growth
0-4yrs
 10,009
 10,209
 200
 2%
5-9yrs
 10,242
 10,942
 700
 7%

10-14yrs

10,077

11,277

1,200

12%

15-19yrs

8,015

10,415

2,400

30%

20-24yrs

6,834

7,934

1,100

16%

25-29yrs

8,852

9,152

300

3%

30-34yrs

10,570

9,870

-700

-7%

35-39yrs

11,398

11,298

-100

-1%

40-44yrs

11,009

12,609

1,600

15%

45-49yrs

10,973

12,673

1,700

15%

50-54yrs

10,719

11,719

1,000

9%

55-59yrs

10,846

10,946

100

1%

60-64yrs

9,075

10,075

1,000

11%

65-69yrs

7,371

9,671

2,300

31%

70-74yrs

7,168

9,268

2,100

29%

75-79yrs

4,943

7,443

2,500

51%

80-84yrs

3,519

5,519

2,000

57%

85-89yrs

2,694

4,494

1,800

67%

90+ yrs

1,749

3,349

1,600

91%

All Ages

156,063

178,863

22,800

15%

Source: DLP analysis of 2014-based SNPP

- The findings of the table above are collated by age group This shows Dacorum's 75+ population is projected to grow by 7,900 people by 2036 – an increase of 61% from 2020.

Chart 17: Population Growth Summary, Dacorum 2020-36

2020

2036

2020-36

% Growth

Under 65yrs

128,619

139,119

10,500

8%

65-74yrs

14,539

18,939

4,400

30%

75+ yrs

12,905

20,805

7,900

61%

All Ages

156,063

178,863

22,800

15%

- We below provide the calculation of needs for specialist accommodation for older people, taking account of:
 - The 2014-based SNPP updated to take account of the latest MYE population estimates
 - An up-to-date assessment of supply
 - Based on the prevalence rates of the SHOP@ toolkit from Housing LIN
- This process identifies the following need figures for specialist older person accommodation in Dacorum for 2020 and the projected increase in future need by
- This shows a total current demand for a total of **2,323 units of retirement housing in Dacorum in 2020**, including sheltered housing (1,613 units), enhanced sheltered housing (258 units), extra care (323 units), and dementia care (129 units). Demand is **projected to increase by a further 1,423 by 2036**.
- It identifies a current demand for **1,420 care home bedspaces in Dacorum in 2020** which is projected to **increase by a further 869 by 2036**.

Chart 18: Dacorum Older Persons Housing Need, 2020-36

Prevalence per 1,000

75+ persons

Demand 2020

Demand 2020-36

Sheltered Housing

125

1,613

988

Enhanced Sheltered Housing

20

258

158

Extra Care

25

323

198

Dementia Care

10

129

79

Sub-Total

2,323

1,423

Care Home

110

1,420

869

Total

3,743

2,292

Source: 2014-based SNPP and Housing LIN Toolkits

- The identified need is higher than the levels identified in the LHNA, principally due to the prevalence rates in the LHNA being adjusted downwards. The figures using the unadjusted prevalence rates (as shown above) shows a

current (2020) demand for around 340 more specialist retirement units than the LHNA modelling and a further 270 more units required by For care homes the unadjusted prevalence rates (shown above) identify a current (2020) demand for around 200 more bedspaces than the LHNA modelling, and a further 150 required by 2036. A comparison between the figures is provided in the tables below.

- The table below also sets out the number of units in the existing supply in Dacorum as set out on the org website run by the Elderly Accommodation Counsel (EAC). This shows that as of 2020 there is an existing supply of 2,064 units of retirement housing and 941 care home bedspaces in Dacorum. The full supply is set out in Appendix A. This provides an updated picture to the LHNA which provides a supply position from 2018 when there were 1,948 retirement housing units and 921 care home bedspaces in Dacorum.
- Table 19 below shows the overall shortfall of older persons accommodation using the 2014- based projections – as aligned with the Standard Method – and the prevalence rates without downward **This shows a current shortfall of 259 retirement units in Dacorum**

Chart 19: Dacorum Supply and Demand of Older Persons Housing – SPRU Figures

Current supply (2020)

2020

demand

Current shortfall

Additional demand to 2036

Shortfall/ surplus by 2036

Retirement Housing

2,064

2,323

259

1,423

1,682

Care Homes

941
1,420
479
869
1,348

Source: SPRU modelling and EAC data

Chart 20: Dacorum Supply and Demand of Older Persons Housing – LHNA Figures

Current supply (2018)

**2020
demand**

Current shortfall

Additional demand to 2036

Shortfall/ surplus by 2036

Retirement Housing

1,942
1,980
38
1,153
1,191

Care Homes

921
1,226
305
714
1,019

- In summary, National Planning Policy and the Planning Practice Guidance clearly set out that the needs of older persons should be met, that local planning authorities should calculate the need for the different types of older persons accommodation and that they may make allocations to meet this need. The PPG states that the need to provide housing for older people is “critical”. As I shall set out below, this situation has only become more critical in the past six
- The Council’s evidence is set out in the 2020 LHNA. For Dacorum, the LHNA identifies a **total requirement for 1,191 additional retirement units over the Plan period** and a **total requirement for 1,019 new care home bedspaces over the Plan period**.
- However, there are significant issues with the approach taken by the LHNA to calculate these demand Most significantly:
 - The LHNA assumptions about population growth and migration flows are not robust and the approach used deviates wildly from the official ONS figures which are nationally consistent.
 - The prevalence rates have been adjusted downwards which is not supported by any evidence in the LHNA. Analysis of the evidence shows that no such downward adjustment is
- This means the LHNA under-estimates the current and future needs of specialist older persons accommodation in Dacorum
- The demand and supply position has been reassessed using the 2014-based projections – as aligned with the Standard Method – and the prevalence rates without downward **This shows a current shortfall of 259 retirement units in Dacorum which is projected to increase to 1,682 by 2036. For care homes there is a current shortfall of 479 bedspaces which is projected to increase to 1,348 by 2036.**

Chart 21: Dacorum Supply and Demand of Older Persons Housing – SPRU Figures

Current supply (2020)

2020

demand

Current shortfall/ surplus

Additional demand to 2036

Shortfall/ surplus by 2036

Retirement Housing

2,064
 2,323
 259
 1,423
 1,682
 Care Homes
 941
 1,420
 479
 869
 1,348
 Source: SPRU modelling and EAC data

Included files	
Title	Housing Delivery
ID	EGS15718
Person ID	1273151
Full Name	Ms Megan Green
Organisation Details	Senior Planner Thakeham Homes Ltd
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Officer Comment	OBJ DM2 DM8 DM10
Housing Delivery comment	Point 4 of Policy DM2 'Affordable Housing' states that "All affordable housing should be genuinely affordable, with the expectation being that the cost will need to be substantially more than 20% below local market prices and rents".

Whilst Thakeham supports the delivery of policy-compliant affordable housing on-site, it does not think it is appropriate for the Council to set the value of affordable dwellings as this has the potential to impact the viability of a scheme. National planning policy defines affordable housing, and the policy must accord with those definitions, which may change throughout the plan period.

Item 2 under Policy DM8 states that “*On housing developments with 40 or more new houses, 5% of the house plots should be made available on site as serviced building plots to enable the delivery of self and custom build properties*”. In order to allow flexibility to reflect the changing demands for self-build and its potential impact on a site’s viability, Thakeham would like to request that the requirement is amended to “up to 5% of the house plots” and also that the threshold to which this policy applies is increased.

Thakeham is concerned that the area of land which would be required to deliver such plots on smaller sites, coupled with 40% affordable housing, would be disproportionate and could impact the viability of a scheme. Further there are logistical, as well as Health and Safety, implications of trying to accommodate self-build plots on a small site. Thakeham would suggest

that self and custom build provision would be more appropriate on larger schemes – those with 100 dwellings or more.

Table 9 of Policy DM10 ‘Accessible and Adaptable Homes’ sets out the percentage of each housing type and tenure under Building Regulations to be included within housing developments. Whilst Thakeham supports the provision of affordable, accessible and adaptable dwellings, we raise concern that the requirement specifically for M4(3) units is high and the level should be agreed on a site by site basis, considering current need, location, scheme viability and impact on density.

Included files

15 Employment Development responses

Title	Employment Development
ID	EGS32
Person ID	1253945
Full Name	Ryan Watson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS49
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Employment Development comment	Policies DM16/DM17/DM18 The strategy plan doesn't show much employment development of new sites. The old existing ones mentioned in this section have lost businesses as I understand it mainly due to the price of business rental rates. If Dacorum want to encourage new businesses into the area this is one aspect that will need addressing. At the moment the only big lure is the location of office and industrial sites located near or on the M1, M25 and A41.5 main line stations could also bear significance. Better inferstructured transport roadways or alternative large vehicle routes may also be a player in a company's choice to locate in Dacorum. With regards to tourism, once again, land scaped areas near to the Motorways, A-roads for touring vehicles. A better public transport hub for town centres and train stations so visitors can travel to their required destination with confidence and ease.
Included files	
Title	Employment Development
ID	EGS58
Person ID	1254532
Full Name	sabra warner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	the large size of the site does not warrent the small number of employed. the amount of large heavy goods lorries using the yard for parking is detremental to the area. Housing here would be a better use of land and be better for the enviroment
Included files	
Title	Employment Development
ID	EGS130
Person ID	1153917
Full Name	Angela Whyte
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>15.5 We have designated two new GEAs at Two Waters Road/A41 junction, Hemel Hempstead (Growth Area HH16) and Dunsley Farm in Tring (Growth Area Tr01). Maylands Business Park is now covered by one GEA, the boundaries of which have been extended to take in land permitted or allocated for employment development at Maylands Gateway and Spencer's Park. Furthermore, the Bourne End Mills and Bovingdon Brickworks GEAs have been extended. Finally, this Plan gives GEA status for the first time to Sunderland Yard's in Kings Langley, to help retain village jobs.</p> <p>Comment</p> <p>Sunderlands Yard - my father is an elderly resident in The Cloisters in Church Lane Kings Langley. Whilst we appreciate that traffic is an issue everywhere in the borough it is entirely inappropriate that very large vehicles use Church Lane to access Sunderlands Yard since the vehicles are too large for the size of the road, cause noise and air pollution as well as restricting access and visibility along the road. My comments are therefore about the type of industry located in Sunderlands Yard and not the fact that this is a general employment area. The 2 companies which seem inappropriately located in Sunderlands Yard, since they are transport companies, are as follows:</p> <p>1</p> <p>Gregory And Davis Transport Limited</p> <p>Sunderland Estate Church Lane, Kings Langley, Hertfordshire WD4 8JU</p> <p>ACTIVE</p> <p>Upgrade to view</p> <p>£561.1k</p> <p>—</p> <p>2</p> <p>J.H. Transport Services Limited</p> <p>Sunderland Industrial Estate, Church Lane, Kings Langley, Hertfordshire WD4 8JU</p> <p>The pedestrian access from The Cloisters to the High Street is minimal and dangerous for such elderly unstable users of the limited pathways. Drivers, the elderly and indeed young pedestrians of Church Lane are frequently intimidated and vulnerable by the presence of large vehicles along Church Lane who give little consideration for vulnerable pedestrian users and restrict visibility due to their size.</p>

There must surely be more appropriate sites for such large vehicles and we would be grateful if alternative sites avoiding access through residential areas could be found for the businesses located in Sunderlands Yard.

Kings Langley has always been a victim of heavy traffic, and the A41 pass by did much to alleviate the N/S traffic noise and pollution from the M25 to Hemel and Aylesbury. However, locally the traffic has increased again since Imagination Technologies has established in the town which has given rise to more commuter traffic. To offset this, if large vehicles were encouraged to avoid residential areas by having transportation companies located away from residential areas, such as Church Lane, this would provide a much improved environment for residents to live. Thank you.

Included files

Title Employment Development

ID EGS257

Person ID 1207707

Full Name Mike Beavington

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Employment Development comment

Included files

Title Employment Development

ID EGS296

Person ID 1259207

Full Name Malcolm Gordon

Organisation Details ExpertEffect Limited

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	15.5 We trade as 'The Carpet Warehouse' on Sunderlands Yard in Kings Langley and have done for in excess of 30 years. We provide employment for 3 x Full Time staff and 1 x Part Time administration. In addition we have 3 x installation contractor teams as required. The nature of the business dictates that we employ locally where possible. Financial support is from outside the County and that would be lost if we were required to vacate. We also use local services. We therefore support the designation of GEA status for the Sunderlands Yard area. Malcolm Gordon. ExpertEffect Limited
Included files	
Title	Employment Development
ID	EGS311
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS372

Person ID	1260058
Full Name	Redbourn Parish Council
Organisation Details	
Agent ID	1260042
Agent Name	David Mitchell
Agent Organisation	Redbourn Parish Council
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS546
Person ID	772477
Full Name	Mr. Roy Warren
Organisation Details	Planning Manager Sport England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Sport England supports Policy DM16 in relation to the flexibility that it offers in relation to permitting the principle of non-office and industrial uses in the General Employment Areas. This is because certain indoor sports facilities, especially health & fitness suites (gyms), activity studios and gymnastics centres, are commonly accommodated in light industrial units which are suitable for meeting their requirements. Such facilities can struggle to find suitable accommodation as office and shop units (e.g. in town centres) are often unsuitable for meeting their needs. As well as meeting the sports facility needs of the community and the associated health and well-being benefits, such facilities also create employment

and can complement employment areas by providing facilities that can conveniently be used by workers before, during or after working hours. In broad terms, such uses are usually compatible with light industrial areas and do not generate any additional planning issues. As the peak hours of use of these facilities is mainly in the evenings and weekends this often complements the employment areas by reducing traffic/parking requirements during peak periods.

In recognition of such uses being an established use in many existing employment areas and due to the potential benefits associated with their provision, it is requested that section 3 of the policy specifically includes them on the list of uses by adding the following:

“3 f. Sports facilities, such as health & fitness suites (gyms), activity studios and gymnastics centres”.

Included files	
Title	Employment Development
ID	EGS602
Person ID	1261122
Full Name	Mark Slade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Should be left to market forces.
Included files	
Title	Employment Development
ID	EGS630
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	
Agent ID	

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

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 Employment Development

ID EGS735

Person ID 1261250

Full Name Christina Thompson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Employment Development comment will this strategy be reviewed following the coronavirus pandemic.

Included files

Title Employment Development

ID EGS968

Person ID 1261569

Full Name Karen Mellor

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Due to Covid the requirement for office space has been substantially reduced to the point where building more offices in the future is a waste of taxpayers money. We need to build back better and building back better means continuing to work from home to reduce the need for travel.
Included files	
Title	Employment Development
ID	EGS1125
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	It is important to retain and encourage local employment throughout Dacorum and particular emphasis and support needs to be targeted at retail and hospitality businesses in the borough, which have been particularly hard hit by the Covid restrictions. We must try and avoid town and village centres becoming waste lands. Removing or reducing parking charges will help encourage shoppers and visitors to return. Improving the road design, accessibility and parking in village centres, especially Bovingdon, will help encourage local shopping and fewer car journeys.
Included files	
Title	Employment Development
ID	EGS1239

Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS1312
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	SP5 DM16 Over the last 30 years Tring town has lost some 30 small scale businesses to change of use to housing. Small scale units at Brook St Mill are welcomed but units have been lost at the Akeman St site. I support DBC resisting employment uses changed to residential. Any Development at the Dunsley Farm site should be small scale, of high quality design and respect the location. "Tin sheds" would be very unwelcome. The Orchard Cottage site and its environs should also be protected from encroachment.
Included files	
Title	Employment Development

ID	EGS1332
Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS1471
Person ID	1253872
Full Name	Georgia Huelamo
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	There is not enough employment opportunity locally, or even wider than Dacorum, for this level of housing growth. Communities will need to travel further afield for work on transport links which are already stretched.
Included files	
Title	Employment Development

ID	EGS1502
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS1583
Person ID	1261809
Full Name	Pam Ferguson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	There are no new employment provisions in Berkhamsted . In fact jobs will be lost with the development of the BFI site and the Sartre Business park . Lidl was granted planning permission several years ago and we are still waiting for the new supermarket in Berkhamsted.
Included files	
Title	Employment Development

ID	EGS1640
Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS1812
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS1831

Person ID	488516
Full Name	mr hugh siegle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Berkhamsted needs continued employment opportunities. The decision to identify the Jewson site on Billet Lane for residential use should be rescinded.
Included files	
Title	Employment Development
ID	EGS1917
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	See my earlier comments.
Included files	
Title	Employment Development
ID	EGS2010
Person ID	1262601

Full Name	Anne Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	With the Covid-19 pandemic and the resulting loss of employment and home working, employment development will need to be reconsidered
Included files	
Title	Employment Development
ID	EGS2044
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	15.1 It is not possible to say anything about this until after the pandemic has settled down.
Included files	
Title	Employment Development
ID	EGS2057
Person ID	1262738
Full Name	Alan Pierce

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS2092
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS2134
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	I have already made my comments on expanding Dunsley Farm as an area of economic growth. Please see above.
Included files	
Title	Employment Development
ID	EGS2266
Person ID	1262925
Full Name	Nandipha Jordan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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.
Included files	
Title	Employment Development
ID	EGS2292
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman

Berkhamsted Residents Action Group (BRAG)

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>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.</p> <p>A similar point is made about the British Film Institute site and BRAG questions why the Council no longer support the Core Strategy local objective of <i>“supporting the BFI to consolidate on their site”</i>.</p>
Included files	
Title	Employment Development
ID	EGS2329
Person ID	1261830
Full Name	alistair budd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS2332

Person ID	1262697
Full Name	Gillian Lindley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	This comment relates specifically to Growth Area TR04 Icknield Way, Tring. There are not a lot of local jobs available in Tring, and the opportunity to create local jobs has been cancelled by the introduction under TR04 of 50 new homes on a site designated under the previously adopted Local Plan LA5 to be an Employment Zone, principally office provision.
Included files	
Title	Employment Development
ID	EGS2380
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	

Title	Employment Development
ID	EGS2416
Person ID	1227518
Full Name	Mr John LOWRIE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	

Title	Employment Development
ID	EGS2422
Person ID	1262981
Full Name	Chris Mabley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>Mention is made of Article 4 directives but these do not preclude change of use from office to residential as shown in Bourne End Mills which was changed to part employment use and part residential.</p> <p>Article 4 needs to be grounds for refusal to change of use and the removal of deemed permitted development rights, especially where it is protecting agricultural land from inappropriate development such as centrally heated so called barns for dog day care. Sui generis employment development is too vague a definition.</p>

The assessment of need is based on out of date reports and needs to take into account other office/employment sites currently standing empty advertised To Let eg The Barns in Bourne End.

Included files

Title Employment Development

ID EGS2600

Person ID 1263206

Full Name Andrew Farrow

Organisation Details Great Gaddesden Parish Council

Agent ID 1253616

Agent Name Andrew
Farrow

Agent Organisation

Yes / No No

* Yes

* No

**Employment Development
comment**

Included files

Title Employment Development

ID EGS2632

Person ID 222269

Full Name Georgina Tregoning

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Employment Development comment	
Included files	
Title	Employment Development
ID	EGS2742
Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS2772
Person ID	1262722
Full Name	Colin McCready
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Employment Development comment	
Included files	
Title	Employment Development
ID	EGS2795
Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	As previously mentioned, Dunsley Farm, London Rd, Tring would make an excellent artisan craft hub, being close to the A41 and a site that is already known locally for local beer and farm produce. If small artisan retail units/workshops were developed it would support the tourism trade, particularly if National Park status was granted. I feel the Council should more actively support National Park Status
Included files	
Title	Employment Development
ID	EGS2876
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 * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS2907
Person ID	1263430
Full Name	Pru Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	This may need to be reviewed in light of the pandemic's affect and likelihood more people will be working where they live. How does this change the infrastructure planning?
Included files	
Title	Employment Development
ID	EGS2928
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3034
Person ID	1258862
Full Name	Tim Beeby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	The sum of the ambition for employment in Berkhamsted is a desire to retain the existing employment areas even though the population would increase by approximately 25%
Included files	
Title	Employment Development
ID	EGS3224
Person ID	1263566
Full Name	Frances Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3270
Person ID	1262255
Full Name	AJ W
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Although Berkhamsted isn't earmarked as employment growth area buildings on Jewson rather goes against the principals of the employment development.
Included files	
Title	Employment Development
ID	EGS3350
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Employment Development comment	You must appreciate that once an employment site is lost to redevelopment into homes, it and its employment potential is gone. An absolute focus should be made to provide for business and light/heavy industry to locate near to all our residential area. Avoiding the need to commute is good for health, work/life balance, communities, the environment and even global warming. We must do our bit in this plan as the outcomes from this plan will be with us for decades.
Included files	
Title	Employment Development
ID	EGS3378
Person ID	1261609
Full Name	DEBORAH CROOKS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3408
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Employment Development comment	<p>The Plan states regarding Employment Development/Tourism:</p> <p>“15.18 We have many popular destinations for day trips in the Borough. They play an important role in generating jobs for local residents and supporting our local businesses, particularly many rural enterprises. They provide leisure and recreational activities for our residents and those visiting the special landscape areas of the Chilterns Hills, the Grand Union Canal, or the many attractive walks crossing the Borough including the Icknield Way or Chiltern Way. Whether it's the Snow Centre or Frogmore Paper Mill in Hemel Hempstead, Ashridge House and Estate, Berkhamsted Castle, the Natural History Museum or Champneys both in the Tring area, or through visiting one of our many open, green spaces, reservoirs or parks, Dacorum provides a wealth of interesting places to visit.”</p> <p><i>Comment:</i></p> <p><i>We would remind DBC that sport is a key driver of tourism and that our existing local community sports clubs effectively attract significant tourism and attract people into Dacorum. They also provide significant employment opportunities - for groundsman, bar staff, cleaners, maintenance staff, coaches, stewards, physiotherapists, bookkeepers, administrators and many more.</i></p> <p><i>The Snow Centre, Xscape, Herts Baseball, Hemel Stags, Tring Anglers are all unique in Herts and beyond and attract players and spectators; and many of the leading clubs in the county are also in Dacorum – e.g. Tring Rugby and Tring Cricket clubs, Berkhamsted Raiders (the second largest junior football club in the country) and Tring Tornadoes. Key sporting festivals and events, such as the Ridgeway Run, attract high numbers of participants from wide and far.</i></p> <p><i>Major new sporting facilities could become flagship venues that attract further tourism and enhance appreciation of the Borough. The creation of exemplary and especially unique sporting venues could increase appreciation of the Borough and attract new visitors and potential new residents.</i></p>
Included files	
Title	Employment Development
ID	EGS3428
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
Employment Development comment	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 and BRAG questions why the Council no longer support the Core Strategy local objective of “supporting the BFI to consolidate on their site”.
Included files	
Title	Employment Development
ID	EGS3504
Person ID	1263810
Full Name	David Tolfree
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	I disagree with the potential removal of Dunsley Farm and Tring Brewery for more houses. As its so close to the A41 , could it increase traffic and bottlenecj due to Tesco being opposite. I also think Tring Brewery is part of the Tring chamr and bring in people to the area.
Included files	
Title	Employment Development
ID	EGS3583
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3592
Person ID	1257698
Full Name	Peter Block
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	More opportunities need to be provided in local manufacturing and service industries to reduce the need to travel long distances to work
Included files	
Title	Employment Development
ID	EGS3603
Person ID	1263865
Full Name	Robin McMorran
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3711
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	most people dont work here
Included files	
Title	Employment Development
ID	EGS3726
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3771
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	This asesment is now out of date. The world has changed. Please stop and reassess the new need.
Included files	
Title	Employment Development
ID	EGS3822
Person ID	1263924
Full Name	Susan Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Employment Development comment	This plan does recognise current and future patterns of working i.e. homeworking or through local hubs. The plan needs to be forward thinking and acknowledge the new reality.
Included files	
Title	Employment Development
ID	EGS3867
Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3939
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3971
Person ID	1263440
Full Name	J Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS3975
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Employment Development comment	<p>Consideration to post pandemic changes in workign patterns now needs to be included in the plans. Will extra office space be needed?</p> <p>I am also concerned that towns like Berkhamsted and Tring etc with so little business and employment development will just become dormitory towns and villages with all the extra housing and no jobs so my comment really goes back to do we need so many new houses in Dacorum?</p>
Included files	
Title	Employment Development
ID	EGS4073
Person ID	1264201
Full Name	Philip Hughes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>5.18 mentions the value of the Chiltern Way, which runs through West Hemel. However, the proposed area HH21 adjacent to Pouchen End Lane will put this path through a housing estate instead of countryside.</p> <p>5.20 says that 'new development and facilities should not detract or harm the very environment that attracts them.' This is exactly what will happen a housing estate is built on the Chiltern Way. HH21 should be avoided for development.</p>
Included files	
Title	Employment Development
ID	EGS4101
Person ID	1264210
Full Name	Fiona Fulford
Organisation Details	myself
Agent ID	1264200
Agent Name	Fiona

	Fulford
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Unfortunately I suspect that all of the assumptions in this section are outdated following the pandemic with: the economy contracting, at least in the short term; increased pressure on business investment (rent rebates ending, corporation tax increasing, increasing online business etc); more home working/ hot desking etc.. Unfortunately these assumptions need to be revisited in 2022/23 once the dust has hopefully settled.
Included files	
Title	Employment Development
ID	EGS4109
Person ID	1264243
Full Name	Howard Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	The employment development is not aligned to proposed residential increases, compounding increase traffic flow with greater commuting distances.
Included files	
Title	Employment Development
ID	EGS4137
Person ID	1262892
Full Name	Jean Farrer

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	There is none in Berkhamsted/Northchurch.
Included files	
Title	Employment Development
ID	EGS4218
Person ID	1263248
Full Name	Johnjo McDermott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>I am opposed to the development of proposed site Tr01</p> <p>Whilst supporting the efforts of Dacorum to play its part in solving the national housing shortage, particularly for local young people who cannot afford houses, we strongly oppose the Dacorum local plan 2020 to 2038 as currently proposed.</p> <p>The number of new homes needed:</p> <p>... is based on outdated figures: the plan is based on Office of National Statistics data from 2014, the more recent predictions of 2018 more than halve the number of new homes needed in Dacorum, and even that data is from before Brexit and Covid so out of date.</p> <p>... the housing target for Hertfordshire is higher than the comparable counties of Surrey and Sussex (www.lichfield.uk).</p>

... there must be a binding commitment for affordable homes in the plan. Too often developers have been allowed to wriggle out of this commitment. Tring is not suitable for this kind of increase in population:

... there is no capacity for more footfall at the station, the car park gets full and the trains to London overcrowded (based on pre-covid numbers).

... the High Street is unsuitable, as the main throughfare from east to west Tring the High Street is narrow and overcrowded for both traffic and pedestrians at peak times. The structure of the High Street has subsided with the current levels of traffic, this will only get worse.

... under the current proposals Tring bears the brunt of new housing with more homes than other towns in Dacorum (percentage terms).

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

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

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

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

Sustainability

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

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

Summary

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

Included files

Title	Employment Development
ID	EGS4231
Person ID	1264301

Full Name	James Stringer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS4260
Person ID	1264269
Full Name	Paul de Hoest
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Numerous local groups have commented on this consultation including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party to name a few. I agree with the stance taken by all of these groups. The fact that all these (and there will be others) are providing the same substantive message from the local population to you should demonstrate that these proposals do not have the support of the people. I do not propose to add to your reading burden by rehashing all of their points
Included files	
Title	Employment Development

ID	EGS4295
Person ID	1264321
Full Name	David` Fox
Organisation Details	personal
Agent ID	1264318
Agent Name	David Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Unfortunately I suspect that all of the assumptions in this section are outdated following the pandemic with: the economy contracting (at least in the short term); increased pressure on business investment (rent rebates ending, corporation tax increasing, increasing online business etc); more home working/ hot desking etc.. These assumptions need to be revisited in 2022/23 once the dust has hopefully settled.
Included files	
Title	Employment Development
ID	EGS4317
Person ID	1264325
Full Name	Olivia Halper
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	DM16 2. Would like to see non-office and industrial uses encouraged to diversify and ensure the vibrancy of GEAs, not discouraged unless particular circumstances apply. This is a key part of the Strategic Design Guide. DM16 Public transportation provision is another key element of GEAs and should be referred to.

15.3 Provision of a *range of employment spaces and typologies within* local, district, town centres and other accessible locations should form part of the strategy.

Included files

Title Employment Development

ID EGS4436

Person ID 1207786

Full Name Anne Foster

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
* Yes
* No

Employment Development comment

Included files

Title Employment Development

ID EGS4458

Person ID 1264316

Full Name Melanie Turner

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
* Yes
* No

Employment Development comment	
Included files	
Title	Employment Development
ID	EGS4502
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS4527
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

**Employment Development
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 Employment Development

ID EGS4579

Person ID 1145918

Full Name Mr Richard Tregoning

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Employment Development comment

Included files	
Title	Employment Development
ID	EGS4662
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS4800
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	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. Office space? More people will be working from home.
Included files	

Title	Employment Development
ID	EGS4866
Person ID	1264524
Full Name	Karen Kang
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	

Title	Employment Development
ID	EGS4967
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent ID	1264539
Agent Name	Bethan Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Unfortunately I suspect that all of the assumptions in this section are outdated following the pandemic with: the economy contracting (at least in the short term); increased pressure on business investment (rent rebates ending, corporation tax increasing, increasing online business etc); more home working/ hot desking etc.. These assumptions need to be revisited in 2022/23 once the dust has hopefully settled.

Included files	
Title	Employment Development
ID	EGS4999
Person ID	1264545
Full Name	Sally Mclver
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>Employment opportunities and apprenticeships for young people are vital, as are the passing on of skills from one generation to the next. There needs to be local funding to support this effectively, integrated with local education provision so that any schemes are accredited and skills can be verified.</p> <p>IT training needs to be made available widely to upskill those who are outside the current workforce, so they can access jobs.</p> <p>Social enterprises and CICs need to be incentivised so that there are plenty of them to benefit the wider community.</p>
Included files	
Title	Employment Development
ID	EGS5012
Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	

Yes / No * Yes * No	Yes
Employment Development comment	15.6 Deleting the Jewson employment site in Billet Lane and allocating it for residential development does not meet bullet point 3. It is in use, is not of low quality and housing would NOT increase <i>the vitality and viability of a town, district or local centre</i> . Reducing the employment sites in Berkhamsted whilst increasing housing by 24% is counter intuitive. The same applies to the British Film Institute site - which was strongly supported for consolidation by DBC in the Core Strategy. BFI is on a hill top site and exacerbates all the problems identified elsewhere.
Included files	
Title	Employment Development
ID	EGS5058
Person ID	1264258
Full Name	Fintan FitzPatrick
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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.
Included files	
Title	Employment Development
ID	EGS5078
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 * No	Yes
Employment Development comment	Land adjoining the Icknield Way industrial area, already designated for an extension to it, should be protected for that purpose and not developed. I support the protection of the Brook Street Silk Mill site. The flour mill at New Mill should be added to the list of protected employment sites. Tring Local History Museum should be protected under the objective of promoting tourism.
Included files	
Title	Employment Development
ID	EGS5108
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Employment Development Markyate - development of the existing small industrial area has already reduced opportunities for designation of a GEA. And more of the areas with existing start up businesses have been earmarked for future development. This is crazy.
Included files	
Title	Employment Development
ID	EGS5114
Person ID	1264550

Full Name	Kevin Fielding
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS5161
Person ID	1264509
Full Name	Hannah Fox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Unfortunately I suspect that all of the assumptions in this section are outdated following the pandemic with: the economy contracting (at least in the short term); increased pressure on business investment (rent rebates ending, corporation tax increasing, increasing online business etc); more home working/ hot desking etc.. These assumptions need to be revisited in 2022/23 once the dust has hopefully settled.
Included files	
Title	Employment Development
ID	EGS5196

Person ID	1264593
Full Name	Rebecca Mackenzie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Surely you need to at least wait for the pandemic to be over before you can even think about an Employment Strategy?
Included files	
Title	Employment Development
ID	EGS5218
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Unfortunately I suspect that all of the assumptions in this section are outdated following the pandemic with: the economy contracting (at least in the short term); increased pressure on business investment (rent rebates ending, corporation tax increasing, increasing online business etc); more home working/ hot desking etc.. These assumptions need to be revisited in 2022/23 once the dust has hopefully settled.
Included files	
Title	Employment Development

ID	EGS5286
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS5332
Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS5350

Person ID	1264363
Full Name	Roselyn King
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Re DM17: I don't think you should be encouraging the development of new offices, given that there is likely to be less demand for office space in the future.
Included files	
Title	Employment Development
ID	EGS5363
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS5408
Person ID	1264491

Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	There seems to be no plans for additional employment in Berkhamsted which will increase car commuting in an already stretched town.
Included files	
Title	Employment Development
ID	EGS5433
Person ID	1264628
Full Name	sophie boden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	<p>Again, you need to stop and rethink this.</p> <p>Maybe your employment development plan seemed accurate when you first commenced developing this strategy but now that we are in a pandemic the way people work has changed. You therefore should be stopping and reflecting on the new ways of working and put forward a proposal that suits this.</p> <p>Again I would advocate comparing this strategy with Bulbourne cross as a different and more attractive option.</p> <p>It is so upsetting you want to turn Green Belt space into offices / industrial space. Once its gone, it is gone.</p>
Included files	

Title	Employment Development
ID	EGS5453
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	'We have many popular destinations for day trips in the Borough.' Is Bovingdon Market the biggest 'tourist' attraction in Dacorum on a Saturday? It would seem to have many negative benefits to local residents and I'm not sure what it contributes to the local economy.
Included files	
Title	Employment Development
ID	EGS5474
Person ID	1264647
Full Name	Richard Burnell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Review this strategy in the wake of Covid 19 and the changed demand for commercial real estate.
Included files	

Title	Employment Development
ID	EGS5607
Person ID	1264679
Full Name	Paul Firth
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	

Title	Employment Development
ID	EGS5648
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	

Title	Employment Development
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ID	EGS5657
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	In the light of the pandemic and its consequences, employment development policies should be revised to take account of changes to the national and local economies and the employment behaviours of the workforce and its employers.
Included files	
Title	Employment Development
ID	EGS5747
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS5844

Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>Dunsley Farm (Tr01) currently caters for small independent businesses which benefit from the rural location, and also being on the main road into the town. With suitable industrial sites available in on a brownfield site in Castlemead, Pitstone, should this not be considered first before an incursion into the visually-appealing greenbelt.</p> <p>Tourism is a vital part of the economy of Tring and should be encouraged. However, if the character if the town is impacted by large housing and iindustrial developments on the approaches, which are visible from the surrounding hills, then the desirable nature of the town for visitors will be diminished.</p>
Included files	
Title	Employment Development
ID	EGS5861
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>In Berkhamsted, developers are busy converting offices, old industrial units into resentidal homes and have been doing so for the past decade, unfettered by any Local Plan.</p> <p>I expect same will happen to stressed retail units affected by Covid.</p>

So Berkhamsted had plenty of brownfield space suited to employment development but it has been squandered. Any proposal top attempt to correct this by taking green belt land instead should be resisted. The themes of this Local Plan strategy should preclude that.

Included files**Title** Employment Development**ID** EGS5882**Person ID** 1264354**Full Name** Juliet Penaliggon**Organisation Details****Agent ID****Agent Name****Agent Organisation****Yes / No** Yes

* Yes

* No

Employment Development comment Unfortunately I suspect that all of the assumptions in this section are outdated following the pandemic with: the economy contracting (at least in the short term); increased pressure on business investment (rent rebates ending, corporation tax increasing, increasing online business etc); more home working/ hot desking etc.. These assumptions need to be revisited in 2022/23 once the dust has hopefully settled.**Included files****Title** Employment Development**ID** EGS6094**Person ID** 1264816**Full Name** Christopher Nicholls**Organisation Details****Agent ID****Agent Name****Agent Organisation****Yes / No** No

* Yes	
* No	
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS6108
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS6190
Person ID	1264872
Full Name	Ben Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
Employment Development comment	Unfortunately I suspect that all of the assumptions in this section are outdated following the pandemic with: the economy contracting (at least in the short term); increased pressure on business investment (rent rebates ending, corporation tax increasing, increasing online business etc); more home working/ hot desking etc.. These assumptions need to be revisited in 2022/23 once the dust has hopefully settled.
Included files	
Title	Employment Development
ID	EGS6219
Person ID	1261819
Full Name	Alex Rathmell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	As outlined in previous responses
Included files	
Title	Employment Development
ID	EGS6245
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS6258
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Joined up thinking is required to allow employment development where it can be best sustained, which is not up narrow country lanes in green fields.
Included files	
Title	Employment Development
ID	EGS6378
Person ID	1262933
Full Name	James Cunningham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Employment Development comment	Inadequate ambition on growth in local employment.
Included files	
Title	Employment Development
ID	EGS6463
Person ID	1264936
Full Name	Jane Cracknell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS6530
Person ID	1264697
Full Name	Nicholas Wood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Employment Development comment	
Included files	
Title	Employment Development
ID	EGS6584
Person ID	1263380
Full Name	Martin Warden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS6595
Person ID	1265007
Full Name	Duncan Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Employment Development comment	With post-Covid seeing a huge reduction in people working from offices, the council needs to factor this in to its plan.
Included files	
Title	Employment Development
ID	EGS6706
Person ID	1265006
Full Name	Tracy Bownes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	These plans are extremely vague with no detail on how they will support the proposed increases in Dacorum population. This may lead to wage deflation in the local areas. There is also a high risk of high unemployment resulting from the proposed population growth without adequate employment planning.
Included files	
Title	Employment Development
ID	EGS6729
Person ID	1264920
Full Name	Anna Wellings Purvis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Employment Development comment	The sectors which have seen significant growth in the past year are deliveries by road and healthcare. This plan does not provide for these and risks worsening traffic jams. More childcare provision will be needed, alongside broadband and energy to residential areas as more people work from home, and these too need assessing and perhaps funding in the plan.
Included files	
Title	Employment Development
ID	EGS6776
Person ID	1261827
Full Name	Ian Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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.
Included files	
Title	Employment Development
ID	EGS6783
Person ID	1265036
Full Name	Tom Burrows
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Employment Development comment	Trings business park is already full and in use. You plan on increasing the size of the town by 55% and belive that you can rely on Icknield way industrial estate to provide employment. Please wake up.
Included files	
Title	Employment Development
ID	EGS6808
Person ID	1261257
Full Name	Simon Tuff
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	The modern uk economy has a large service and knowledge component. Neither of these sorts of activity seem to be considered or encouraged in this plan. Especially post C19 many organisations will be looking to create extended and flexible working patterns, yet with opportunities to bring colleagues together, sustain interactions with customers and develop life long learning and development. This has to present opportunities which are both more fulfilling and more sustainable. Yet this kind of imaginative opportunity is not considered in this plan as far as I can tell.
Included files	
Title	Employment Development
ID	EGS6891
Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS6905
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS6960
Person ID	1265105
Full Name	Jonathan Tay
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS7043
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	I feel sure that employment policy will need to be revamped in the post covid situation. Nobody knows yet how this will pan out.
Included files	
Title	Employment Development
ID	EGS7049
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Employment Development comment	Too late to elaborate.
Included files	
Title	Employment Development
ID	EGS7102
Person ID	1265142
Full Name	Alan Anderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Re 15.5, I don't think Sunderlands Yard at Kings Langley should be given General Employment Area status, because this industrial yard is located highly inappropriately in a very residential area, does not employ a significant number of people, and for years has been causing serious problems for constituents. The noise at anti-social times of day, the dust, the storage of hazardous substances, and the heavy goods traffic in Church Lane are just some examples of the problems suffered by the many neighbouring residents. It also could be said that the current owners of the yard are opposed to selling the yard for residential redevelopment, so it does not need GEA protection.
Included files	
Title	Employment Development
ID	EGS7119
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate.
Included files	
Title	Employment Development
ID	EGS7199
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	I can't imaging Tring ever creating sufficient employment opportunities for the 50% increase in population. So, that means more commuting, more traffic, more damage to the environment!
Included files	
Title	Employment Development
ID	EGS7240
Person ID	1264956
Full Name	Caroline Heard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Employment Development comment	
Included files	
Title	Employment Development
ID	EGS7736
Person ID	1265778
Full Name	Councillor Lara Pringle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	— 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.
Included files	
Title	Employment Development
ID	EGS8796
Person ID	1261814
Full Name	Liz Uttley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Employment Development comment	DM16 This policy needs to be reconsidered in the light of the pandemic and expected changes in work, shopping and living habits.
Included files	
Title	Employment Development
ID	EGS8811
Person ID	1158356
Full Name	Colin Blundel
Organisation Details	Planning Officer Chiltern Society
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Policy DM19 - Mix of uses in Town, District and Local Centres Policy – Given the impacts of Covid-19 on retail and other businesses, 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.
Included files	
Title	Employment Development
ID	EGS9259
Person ID	1267329
Full Name	MARTIN DAVIES
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	— 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.
Included files	
Title	Employment Development
ID	EGS9305
Person ID	1267332
Full Name	Nandi Jordan
Organisation Details	Chair Berkhamsted and Tring Labour Party
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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.
Included files	
Title	Employment Development
ID	EGS9675
Person ID	1267468
Full Name	Chris Berry
Organisation Details	CPRE Hertfordshire

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	<p>CPRE Hertfordshire urges the Council to review the Guiding Development section of the Consultation Plan in the context of the changes sought in our representations, to the proposed strategy and the excessive scale of development therein, latest government planning policy and regulations, and the new evidence available on household and population trends. This is particularly necessary for Chapters 14 on Housing Delivery and 15 on Economic Development.</p> <p>Chapter 15 refers to meeting 'the required floorspace requirement we have identified.' Unfortunately the Council's studies must be updated in the light of fundamental changes resulting from Covid 19 in the way businesses and office based organisations are likely to operate for the foreseeable future and the consequential changes to floorspace demand.</p> <p>Paragraph 15.7 on the Council's expectations and proposals for 'new and expanded employment areas', should be reconsidered, so that land is not removed from the Green Belt for development that may not be required at all, or could be accommodated through redesign and regeneration within the existing urban footprint. Policy DM16 and table 19 should therefore be re-written, as exceptional circumstances for 'growth' almost certainly do not exist for development of existing Green Belt land at Bourne End and Bovingdon Brickworks.</p> <p>Similarly, policy DM17 for Offices in 'growth areas' must be reviewed as the 'relevant evidence' identified by the Council to justify these is both out of date now, and have taken no account of the post Brexit and Covid 19 changes to the economic climate.</p>
Included files	
Title	Employment Development
ID	EGS10427
Person ID	334456
Full Name	Mr Martin Cotton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Employment Development comment	I realise that Covid is mentioned towards the end of the Plan, but it will plainly have a lasting effect on how and where people live. I suggest that it may well make many of the projections in the Plan specious, if not totally invalid. Unfortunate timing, perhaps, but something that needs to be addressed before rushing headlong into something that will out of date before it has even started. In this regard, I would specifically draw attention to Policy DM17.
Included files	
Title	Employment Development
ID	EGS10455
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	We must protect employment areas in local town centres. As an example The Akeman Business Park being converted to housing in Tring saw the loss of many small thriving local businesses close to the High Street that were core to the local community. One example of many is the dog grooming parlour 'Posh Paws' which was unable to find a new location in the town centre and forced out of business.
Included files	
Title	Employment Development
ID	EGS10539
Person ID	1268671
Full Name	Mr Mike Jennings
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	As noted in the previous section the requirements for development are out of date. There is no understanding within the plan that the location of Tring is adjacent to the Buckinghamshire border and the large and expanding town of Aylesbury. The developments over the border are important in the context of the Dacorum local plan, especially the large provision of warehousing and employment opportunities provided by the Aylesbury expansion. Nearby development in Aylesbury is not taking place in isolation and must influence the contents within the Dacorum plan. This point is expanded upon within the Tring in Transition response.
Included files	
Title	Employment Development
ID	EGS10676
Person ID	1161079
Full Name	Melanie Llewellyn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Section (15) Employment Development Do you have specific comments about any of the Employment Development policies? YES 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. DCB 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.
Included files	

Title	Employment Development
ID	EGS10697
Person ID	1268744
Full Name	DAVID FULLER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	<ul style="list-style-type: none"> Although the population would increase by approximately 25% there appear to be no plans to expand existing employment areas
Included files	

Title	Employment Development
ID	EGS10738
Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	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.
Included files	

Title	Employment Development
ID	EGS10943
Person ID	1268880
Full Name	Ms Jo-anne Tunmer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	— 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. In addition, the plan also 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	Employment Development
ID	EGS11029
Person ID	1268910
Full Name	SIMON LAWSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Two other events since 2014 may also materially affect projections of required development: Brexit and the Covid 19 pandemic. How far are you updating your forecasts to allow for the economic impact of these developments? Together with changes in the retail sector (from in person to online shopping), there may be less demand for commercial and

industrial space. In turn, this may free up more Brown Field space than could have been envisaged when the Plan was compiled.

Included files

Title Employment Development

ID EGS11380

Person ID 1207629

Full Name Strategic Planning Department

Organisation Details Strategic Planning Department
Three Rivers District Council

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Employment Development comment Policies DM16 General Employment Areas and DM17 Other Office and Industrial Sites are welcomed and will help to protect employment areas and existing sites providing office and industrial floorspace.

Included files

Title Employment Development

ID EGS11385

Person ID 1207629

Full Name Strategic Planning Department

Organisation Details Strategic Planning Department
Three Rivers District Council

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No	
Employment Development comment	Policy DM16 – General Employment Areas: The designation of Sunderland’s Yard, Kings Langley as a General Employment Area is supported; as stated, this site currently provides small units in office and industrial use. The protection of these units for these employment uses through Policy DM16 will be important in order to avoid further floorspace losses, particularly when taking account of shortages of employment land in Dacorum. The designation of this GEA is also supported as it will help to retain the provision of jobs in Kings Langley.
Included files	
Title	Employment Development
ID	EGS11424
Person ID	1269025
Full Name	JOHN MAWER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	<p>1 Employment strategy / growth areas. Hard to see how office/ industrial development in Bourne End would be of value. It would most likely simply increase driving from Hemel Hempstead or Berkhamsted.</p> <p>However, it is easy to see how it would counter the Vision which to ‘Protect the countryside and other small villages from development.’</p> <p>People are currently moving into the 45 houses recently built on the derelict industrial estate. Their route into the countryside is along Upper Bourne End Lane. This area of greenery may be small in relation to other areas, but to this village it is significant and forms a backdrop to the cricket pitch.</p> <p>What Bourne End has is very easy walking and cycling routes to Hemel Station. Sadly, this is currently unsupported in the highways infrastructure.</p>
Included files	
Title	Employment Development
ID	EGS11442

Person ID	1264362
Full Name	Juliet Miller
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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.
Included files	
Title	Employment Development
ID	EGS11681
Person ID	1269212
Full Name	PETER SCOTT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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.

Included files	
Title	Employment Development
ID	EGS11798
Person ID	1269238
Full Name	Dr Jill Timms
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>1 Green employment - This plan could be part of a more sustainable economic policy that facilitates the development of many more green jobs, where a living wage is paid for skilled work that contributes to solutions to the climate crisis. There is an opportunity to be creative in our approach to this plan, which would not provide for the minimal environmental standard, but would actually generate the skills and experience for Dacorum to be at the cutting edge of the fourth industrial revolution. Examples could include the design of eco-buildings as well as skills used to retrofit existing properties, as well as innovative approaches to community resources and local community based food growing projects.</p>
Included files	
Title	Employment Development
ID	EGS11914
Person ID	1268937
Full Name	Mrs Lynette Hyde
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	Question 3 Specific comment on guiding development policies Yes The pandemic will cause in reduction in demand for office space, therefore brownfield sites can be redeveloped and commercial buildings converted to residential use.
Included files	
Title	Employment Development
ID	EGS12031
Person ID	1207341
Full Name	Mr Adam Wood
Organisation Details	Growth and Infrastructure Manager Hertfordshire Local Enterprise Partnership (and Herts IQ)
Agent ID	1264277
Agent Name	Rob Shipway
Agent Organisation	Lead Consultant Civix
Yes / No * Yes * No	Yes
Employment Development comment	The LEP supports the Guiding Development policies in respect of Employment Development.
Included files	
Title	Employment Development
ID	EGS12125

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	
Employment Development comment	1 Employment Development Policies DM16 to DM18 – Employment Development No objections
Included files	
Title	Employment Development
ID	EGS12163
Person ID	1269444
Full Name	Mr & Ms Jim & Katie Barnard & Partridge
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	— 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	Employment Development
ID	EGS12384
Person ID	232349
Full Name	Mr Lawrence Parnell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>Employment.</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> <ol style="list-style-type: none"> 1 DBC takes into account the changes already approved and taking place within the TRDC area, and 2 Consults with TRDC, and argues against further diminution in existing employment floorspace. <p>Tourism.</p>

Part 1, para.15.18. Why is Kings Langley overlooked? Viz: the tomb of the first Duke of York in All Saints Church, the site of the Royal Palace (including a recently revealed built segment opposite the Old Palace PH) and Priory, and Langley Hill the apocryphal source of the rhyme 'The Grand Old Duke of York'. Please consult with Kings Langley History Society.

Included files

Title Employment Development

ID EGS12386

Person ID 1164091

Full Name R.J. Hollis

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Employment Development comment The guiding policy should include job opportunities to go with housing. When Hemel Hempstead was being developed, the industrial estate provided jobs for everyone. Whilst that thinking is no longer appropriate, the current plan for Berkhamsted is to provide lots of housing and remove job opportunities (for instance the Jewsons site), this is not joined up thinking.

The Covid pandemic has shown us alternative working practices (largely working from home) which may well become permanent. This should change policies; there will be office space available to develop as housing.

Included files

Title Employment Development

ID EGS12431

Person ID 1146040

Full Name Mrs Rachel Macdonald

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	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.
Included files	
Title	Employment Development
ID	EGS12435
Person ID	1146040
Full Name	Mrs Rachel Macdonald
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	Employment Development 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.
Included files	
Title	Employment Development
ID	EGS12590
Person ID	1269561
Full Name	Mr & Mrs Martin & Tracey Martin & Tracey Read

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	<ul style="list-style-type: none"> The policies do not take into account the impact of the Covid The changes in lifestyle necessitated through the move towards home based and remote working, and increased flexibility towards home/work balance have not been properly taken into account. The plan does not take into account the likely increase in empty retail or office space in town centres as a result of the Covid changes, missing a once in a generation opportunity for change.
Included files	
Title	Employment Development
ID	EGS12686
Person ID	1269591
Full Name	Ross Campbell
Organisation Details	Client Director Aberdeen Standard Investments
Agent ID	1269593
Agent Name	Jessica Wilson
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	<p>Policy DM16 – General Employment Areas</p> <p>The Site is allocated as a GEA under the Draft Proposals Map to which this policy relates. It is noted that the GEA has been reduced in size and no longer extends to cover the immediately adjacent residential and hotel developments.</p>

Part 4) states that in Article 4 areas, proposals for residential uses will be resisted. This is not considered appropriate as the Article 4 Direction itself provides DBC with sufficient protection against the use of the office to residential permitted development right under Class O. The Site is located in such an area and is considered appropriate for residential uses which should be appropriately assessed through a planning application should one be submitted. It is acknowledged that an Article 4 does not allow for any flexibility, but policy should do so, as set out in 2.8 above, in allowing a development to be appropriately assessed as part of the planning balance.

The policy is also not considered to give sufficient consideration to the new Use Class E [*footnote 1: the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020*] which came into force on 1st September 2020. The existence of the new Use Class is referenced in para. 15.2, but there is no acknowledgement that this now allows for a significant list of alternative activities to occupy sites which previously benefitted from 'B1' office use without the need for planning permission. The Site is such an example where planning permission would not be required to change to a number of uses, including those which would arguably have a greater impact on the surrounding area, for example, the residential uses immediately adjacent.

Similarly, there is a new permitted development right (Class ZA) [*footnote 2: Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 3) Order 2020*] which allows for demolition of commercial buildings under office use and replacement new buildings as dwellings. It is also noted that the Government have recently announced a further consultation [*footnote 3: Supporting housing delivery and public service infrastructure – Published 3 December 2020*] which includes the potential for a wider permitted development right which will allow for change of use to residential from the entirety of Class E, not just offices.

The national approach is therefore clear in that planning policy should allow for sufficient flexibility in uses, even more so given the Covid-19 pandemic. It is likely that there will be a dramatic change in the behaviours of individuals and businesses in their approach to working and prescriptive policy around employment floorspace is therefore not considered appropriate. The policy should provide sufficient flexibility for cases such as at the Site where despite active marketing for almost a year, no suitable office occupier has been secured and therefore the Site remains vacant and unable to meet the requirements of the NPPF (2019) to maximise its usability as a sustainably located and previously developed Site.

The policy should be reviewed to allow for sufficient flexibility and a mixed-use approach in accordance with the national approach to policy. It is acknowledged that DBC need to set a clear strategy for economic investment, but planning policy is also required to be flexible enough to capture the future needs/ changes to demand which are not anticipated in the Plan and this policy is not considered to do so.

Included files

Title Employment Development

ID EGS12708

Person ID 1269600

Full Name Alex Marsh

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	<ul style="list-style-type: none"> The policies do not take into account the impact of the Covid The changes in lifestyle necessitated through the move towards home based and remote working, and increased flexibility towards home/work balance have not been properly taken into account. The plan does not take into account the likely increase in empty retail or office space in town centres as a result of the Covid changes, missing a once in a generation opportunity for change.
Included files	
Title	Employment Development
ID	EGS12772
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	
Employment Development comment	This position is exacerbated by draft policy DM16 – General Employment Areas, which seeks to protect development and redevelopment in the identified areas to office, industrial uses or warehousing, depending on the specific characteristics of the policy. Table 19 within the policy specifically identifies Doolittle Meadows, where Network House is located, as an area where ‘good quality offices should be retained and changes of use from employment uses to housing will be resisted’. This policy is considered to be overly restrictive and is not in line with national policy.

The NPPF (2019), paragraph 80 states that *'planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt'*. Paragraph 81 goes on to state that *'planning policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period'* and also *'be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances'*.

The Planning Practice Guidance (Reference D: 2a-026-20190220) reaffirms the need to look at evidence across functional economic areas as well as clarifying the evidence needed to inform strategy plan making, including the locational and premises requirements of particular types of businesses.

The PPG goes on (ID: 2a-027-20190220) to consider the use of market signals in forecasting future need and sets out that *'authorities will need to take account of longer term economic cycles in assessing this data, and consider and plan for the implications of alternative economic scenarios'*.

Policy SP2 and DM16 (along with SP5 not explicitly covered in this representation) need to be amended to accord with national policy and need to be supported by an updated evidence, with reports such as the PBA Employment Land Availability Assessment (ELAA) prepared in 2017 to support the production of the Local Plan, now being well of date, and failing to reflect the reality of office availability in the area.

A continuation of blanket policies on protection of existing employment sites, based on their location should be avoided. As noted above, there will be sites such as Network House, which despite theoretically being in good locations for employment use, with access to the railway station etc... , will contain floorspace that is a) no longer fit for purpose and b) not viable to redevelop for employment purposes.

Feedback on a recent pre-application enquiry made by Redington Capital, exploring the possibility of redevelopment of Network House for a mixed use, residential led scheme indicated that Officers see the protection of the site for employment as essential, despite clear evidence that the site will remain unused unless some form of viable redevelopment takes place. This ties into the conclusions of the ELAA which states at paragraph 4.42:

'In stronger demand locations such as Kings Langley and Apsley there are some vacant units which also need to be protected to capture existing demand'.

Whilst the rationale behind this approach is understood due to the attractiveness of the location, given the general over supply of office floorspace in the wider area, coupled with the need for additional housing land, the NPPF focus on brownfield redevelopment and issues around viability and demand, a more flexible policy approach is needed.

We would advocate the inclusion in the Local Plan, most likely as a refinement of policy DM16, of a policy similar to that in the Watford Local Plan, set out below, which identifies and seeks to protect the key office locations, but does so in line with national policy, being flexible enough to allow redevelopment when this can be properly justified, as is the case at Network House where the existing form of development heavily limits the attractiveness of the site.

Draft Watford Local Plan Policy EM4.3: Office Development

The Clarendon Road Primary Office Location is located on the Policies Map.

Proposals for new office development that result in no net loss of office floorspace in the Clarendon Road Primary Office Location will be supported. Proposals that would incur a net loss of office floorspace will be resisted unless:

- a. An up to date evidence base demonstrates that the site is no longer required for office use; or*
- b. The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for office use in the medium*

Without such a policy, the draft Local Plan is unduly prescriptive and does not allow investors the opportunity to release the potential of land and meet local needs over the course of the Plan period, as is an expectation of national policy.

Included files

Title Employment Development

ID EGS12808

Person ID 1144694

Full Name Mr Barry Fuller

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Employment Development comment

- Although the population would increase by approximately 25% there appear to be no plans to expand existing employment areas

Included files

Title Employment Development

ID EGS12815

Person ID 1269634

Full Name Frank Worth

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<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>
Included files	
Title	Employment Development
ID	EGS12863
Person ID	1269661
Full Name	Ray Guirguis
Organisation Details	OSD Healthcare
Agent ID	1269662
Agent Name	Nick Baker
Agent Organisation	Planning Director Lichfields
Yes / No * Yes * No	
Employment Development comment	<p><i>Policy SP5 – Delivering the Employment Strategy</i></p> <p>OSD supports this policy in principle, and the desire to grow and develop Dacorum’s economy by the continued development of Hemel Hempstead as an important economic centre for the Borough in particular. OSD notes that Dacorum BC wishes to attract new businesses, encourage business start-ups and assist small businesses to grow, especially in Employment Growth Areas, where provision for small and medium sized businesses will be required.</p> <p>However, it is considered that this aspiration is constrained by the current HSE Consultation Zones which relate to Buncefield Oil Terminal as development in proximity to the site, for example within the Maylands Gateway Employment Growth Area, will be subject to restrictions due to the current Consultation Zones. We request that these are reviewed</p>

as part of the Local Plan process in order to maximise the range of uses and opportunities that can be accommodated in the Maylands Business Park, including on the OSD site.

Included files

Title Employment Development

ID EGS12865

Person ID 1269661

Full Name Ray Guirguis

Organisation Details OSD Healthcare

Agent ID 1269662

Agent Name Nick
Baker

Agent Organisation Planning Director
Lichfields

Yes / No

* Yes

* No

Employment Development comment *Policy DMXX – General Employment Areas*

This is presumed to be DM16. The OSD site falls within this designation on the Draft Policies Map. In principle, OSD supports the draft Policy as it goes some way to ensuring that appropriate land is set aside and protected for office, industrial, and other suitable uses. We note and support that the Policy states non- office and industrial uses will be permitted if they will provide important services and facilities that would enhance the attractiveness of the GEA as an economic centre.

The draft Policy should however be revised to explicitly support medical facilities under Part 3, in order to recognise the existing use of the OSD site as a medical facility within the Mayfields Business Park. Medical facilities are recognised as a community use under Paragraph 20, Part c of the National Planning Policy Framework (NPPF). Therefore, Part 3, subsection e, of the Policy should add “medical facilities” to the list of acceptable community uses.

Table 19 (General Employment Areas) of the Policy notes that development within the Buncefield and Maylands Business Park GEAs may be restricted due to the storage of notifiable hazardous substances at Buncefield Oil Terminal, and advice is required from the Health and Safety Executive (HSE) for any development in relative proximity. We are aware of the extent of the current HSE consultation zones, but have some concerns that these do not relate to current storage activities at the site, with development in the surrounding area unreasonably and unnecessarily constrained as a consequence. A review and possible reconfiguration of the Buncefield facility and a re-assessment of the associated

consultation zones as set by the HSE could allow for development in areas which, due to the revised configuration of the Buncefield site after the 2005 explosion, would be safe to operate, but currently fall within outdated 'advise against' zones for the HSE. This exercise should be undertaken by DBC as the Local Planning Authority (LPA) and Hazardous Substances Authority (HAS) as part of the Local Plan preparation process.

A positive revision of the zones would strengthen the role and operation of both the Maylands Business Park and Buncefield GEAs. Therefore, OSD requests that Dacorum, as both the LPA and the HSA, carefully consider the restrictions imposed by the Buncefield Oil Terminal installation and whether the Consultation Zones should be addressed as part of this Local Plan process in order to facilitate and support economic development and the Plan's overall objectives.

Included files

Title Employment Development

ID EGS12881

Person ID 1207443

Full Name Mrs Jennifer Bissmire

Organisation Details Clerk
Markyate Parish Council

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Employment Development comment **Employment**
General Employment Areas

Ref 15.6 (and 8.16.4 in the Sustainable Development strategy) both say that employment areas should be retained unless there are strong reasons to the contrary. However, the Dacorum Local Plan goes on to pick two areas in Markyate to be redeveloped for housing. Markyate Parish Council strongly oppose these proposals. They would remove all access to local car maintenance businesses including an MOT test centre, and mean that all of the local car owners would have to travel elsewhere and possibly remain there while work on their car is completed. Currently local residents leave their vehicles for service etc and walk home until their vehicle is ready. This loss of local servicing is not a sustainable policy and should not guide local development.

Markyate has a long-established skilled engineering workforce with small businesses meeting specialised needs of Luton based Companies such as Vauxhall and suppliers to Luton Airport. Dacorum policy makers have consistently failed to

acknowledge this and local employers have been lost. Markyate Parish Council urge recognition of our skilled engineering workforce and support for our employment areas.

Retailing and Other Town Centre Uses

As recorded under Sustainable Development Strategy, the Dacorum Local Plan seeks to manage the long term resilience of town centres

Ref Policy SP6, relates to the local towns, district centres and local centres around Hemel as well as Bovingdon and Kings Langley, but Markyate is ignored. Markyate Parish Council deplores this omission. 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 Dacorum Local Plan shows no knowledge of our village; the Parish Council want to see this remedied. Ref Policy DM20 – does mention Markyate, suggesting our shops will mainly be selling convenience goods with others meeting small scale food and drink uses

This is an insult to our community and the businesses that serve us. Markyate Parish Council feel very strongly that Markyate should be treated as a town centre, albeit smaller than many, but should receive the support needed to help it thrive.

Unlike businesses in towns, it is difficult to generate adequate income to cover rental as well as business costs and consideration should be given to relaxing the business rates and other Council costs commensurate with the relative rental costs. If not supported, economics will dictate that village businesses are all converted to housing in the long term and the village becomes no more than a dormitory.

Included files	
Title	Employment Development
ID	EGS12929
Person ID	1269677
Full Name	CAROLINE CLIST
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Employment Development comment	There may need to be a re-think about some of the details to make them work in the post-Covid world. Public services (including thier employment opportunities) need to be near other employment locations but also near to housing (including home working) if a move from car transport is to be acheived.
Included files	
Title	Employment Development
ID	EGS13049
Person ID	1270013
Full Name	Mr Daniel Ritchie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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.
Included files	
Title	Employment Development
ID	EGS13165
Person ID	1270069
Full Name	Patrick Moloney
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Employment Development comment	<ul style="list-style-type: none"> The policies do not take into account the impact of the Covid The changes in lifestyle necessitated through the move towards home based and remote working, and increased flexibility towards home/work balance have not been properly taken into account. The plan does not take into account the likely increase in empty retail or office space in town centres as a result of the Covid changes, missing a once in a generation opportunity for change.
Included files	
Title	Employment Development
ID	EGS13179
Person ID	1144725
Full Name	Mr Philip Anderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Employment Development comment	<ul style="list-style-type: none"> 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	Employment Development
ID	EGS13215
Person ID	1270128

Full Name	Richard Salway
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	Employment Development 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.
Included files	
Title	Employment Development
ID	EGS13466
Person ID	1270266
Full Name	VANDA EMERY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	1) As stated above the government house building targets are flawed, and not in the best interest of the country let alone dacorum. It is there for the boroughs duty to oppose them, and link up with other councils who think the same. This issue is a lack of affordability and all the new job creating being focus in areas where there is already a shortage of housing rather than areas where there is a surpluss. EVIDENCE: https://blogs.lse.ac.uk/politicsandpolicy/tackling-the-uk-housing-crisis/ https://www.greenhousethinktank.org/uploads/4/8/3/2/48324387/housing-final.pdf https://www.ft.com/content/c94adfb8-72f2-4438-b265-a72761578fa1

<https://www.cpre.org.uk/wp-content/uploads/2019/11/set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside.pdf>

2) It would there for follow that creating more space for employment will just create more demand for housing. Not everybody in England can live in the south east. Yes there will need to be some land use converagion which leads to jobs creation, but this should be balance with the loss of jobs in other sectors (due to phasing out of high carbon industries) as part of a just transition.

Included files

Title Employment Development

ID EGS13545

Person ID 1260521

Full Name Steve Ritchie

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Employment Development comment 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.

Included files

Title Employment Development

ID EGS13677

Person ID 1207133

Full Name Chilterns Conservation Board

Organisation Details Chilterns Conservation Board

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	DM18 Tourism Object. While the supporting text to this policy mentions the Chiltern Hills and other attractions in the AONB, the CCB considers that the particular value of the Chilterns AONB in supporting local economies through tourism could be drawn out more. We also consider that the policy itself could be improved by including reference to supporting tourism activities that are consistent with the reasons for the area's designation, including where these are not necessarily located in or adjacent to an existing settlement. Such support could be particularly useful for farm diversification. CCB's officers would be willing to assist DBC with drafting appropriate wording.
Included files	
Title	Employment Development
ID	EGS13894
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Employment Development comment	Employment Development 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.
Included files	
Title	Employment Development
ID	EGS14253

Person ID	1152075
Full Name	Rob Wakely
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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.
Included files	
Title	Employment Development
ID	EGS14364
Person ID	1270640
Full Name	Geoffrey Llewellyn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	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. DCB 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.

Included files

Title Employment Development

ID EGS14484

Person ID 1270672

Full Name ICP Asset Management Ltd

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Employment Development comment Policy DM16 – General employment areas. Bullet 3 should include reference to care and nursing home uses as an additional acceptable use given the job generating benefits of such uses.

Included files

Title Employment Development

ID EGS14565

Person ID 1270700

Full Name Mr Peter Sims

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Employment Development comment	<ul style="list-style-type: none"> As stated above the government house building targets are flawed, and not in the best interest of the country let alone dacorum. It is there for the boroughs duty to oppose them, and link up with other councils who think the same. This issue is a lack of affordability and all the new job creating being focus in areas where there is already a shortage of housing rather than areas where there is a EVIDENCE: <p>https://blogs.lse.ac.uk/politicsandpolicy/tackling-the-uk-housing-crisis/ https://www.greenhousethinktank.org/uploads/4/8/3/2/48324387/housing-final.pdf https://www.ft.com/content/c94adfb8-72f2-4438-b265-a72761578fa1 https://www.cpre.org.uk/wp-content/uploads/2019/11/set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside.pdf</p> <ul style="list-style-type: none"> It would there for follow that creating more space for employment will just create more demand for Not everybody in england can live in the south east. Yes there will need to be some land use converagion which leads to jobs creation, but this should be balance with the loss of jobs in other sectors (due to phasing out of high carbon industries) as part of a just transition.
Included files	
Title	Employment Development
ID	EGS14952
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 Gorbng
Yes / No * Yes * No	
Employment Development comment	Employment Development HCC welcomes the inclusion of the existing employment provision at Dunsley Farm set out within Policy DM16 , together with the reference to the additional employment space to be generated as part of the Tr01 Growth Area.

Included files	
Title	Employment Development
ID	EGS15101
Person ID	1270925
Full Name	Mrs Kathryn Salway
Organisation Details	Extinction Rebellion Dacorum
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	Employment Development 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.
Included files	
Title	Employment Development
ID	EGS15272
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

<p>Employment Development comment</p>	<p>Maylands Hemel Hempstead (1)</p> <p>Recognised ecology sites within Site</p> <p>Yes, the following Ecosites - part of ‘Buncefield Lane Field behind Cemetery’; ‘Breakspear Way Sports Ground’; ‘Hales Close Scrubby Grassland’; ‘Hedgerow of former Horse Field, Wood End Lane’; part of ‘Disused Railway Line, Hemel Hempstead Old Sections’.</p> <p>Recognised sites adjacent/ close to site</p> <p>Adjacent to the following LWS - Maylands Wood; Widmore Wood; Disused Railway Line, Hemel Hempstead. Adjacent to the following Ancient Woodland Inventory woodlands - Yewtree Wood, Widmore Wood, Maylands Wood (part AWI). Adjacent to the following Ecosites – ‘Buncefield Oil Depot and Punch Bowl Lane Pastures’; remaining part of ‘Buncefield Lane Field behind Cemetery’; ‘High St. Green Playing Field and Wood’; ‘Yewtree Wood Park’; ‘Hammond School Playing Field’; part of ‘Disused Railway Line, Hemel Hempstead Old Sections’ Part of ‘Jarvis Dell Manorial Waste & Leverstock Green’ Common Land goes through the site.</p> <p>Other features</p> <p>Largely previously developed land. Buildings and Units on hardstanding. Scattered trees throughout. Western side abuts Hemel Hempstead, eastern side abuts largely undeveloped agricultural land. Historically, traditional orchards existed within the site boundary and north, south and west of the boundary.</p> <p>Protected species</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 and buildings if suitable roosting features are present.</p> <p>Opportunities</p> <p>Retain any trees and hedgerows. Buffer adjacent woodlands. Create green corridors to adjacent habitats. 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>Biodiversity Net Gain (BNG)</p> <p>Consider measures to achieve net gain.</p> <p>Ecological sensitivity</p> <p>Low. Avoid light spill on trees / hedgerows and adjacent habitats.</p> <p>Fundamental ecological constraint</p> <p>None apparent. Preliminary Roost Assessment may be required. Ecological Appraisal may be required to determine ecological interest and impacts of any development.</p>
<p>Included files</p>	
<p>Title</p>	<p>Employment Development</p>

ID	EGS15273
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>Maylands Hemel Hempstead (2)</p> <p>Recognised ecology sites within Site NO</p> <p>Recognised sites adjacent/ close to site Adjacent to 'Breakspear Way Open Space' Ecosite.</p> <p>Other features Previously developed land with buildings, hardstanding, mature trees scattered throughout and in lines.</p> <p>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.</p> <p>Opportunities Retain trees. Enhance green corridor to adjacent habitats, especially on the western edge. Consider enhancement measures such as native-species planting / Wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p> <p>Biodiversity Net Gain (BNG) Consider measures to achieve net gain.</p> <p>Ecological sensitivity Low. Avoid light spill on trees / hedgerows and adjacent habitats.</p> <p>Fundamental ecological constraint</p>

None apparent. Preliminary Roost Assessment may be required. Ecological Appraisal may be required to determine ecological interest and impacts of any development.

Included files

Title Employment Development

ID EGS15274

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

Employment Development comment

B&Q and Travis Perkins

Recognised ecology sites within Site

NO

Recognised sites adjacent/ close to site

Adjacent to an Ecosite called 'Lawn Lane Field and Wood'. Within 20m of Boxmoor Common LWS and Common land, but separated by Two Waters Road.

Other features

Previously developed land. Southern boundary is adjacent to Grand Union Canal.

Protected species

Water voles have been recorded in the area in the past. There may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present.

Opportunities

Create a green corridor along the southern boundary to link habitats to the east and west and along the canal. 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 canal and woodland to the south-east.

Fundamental ecological constraint

None apparent. Preliminary Roost Assessment may be required.

Included files

Title Employment Development

ID EGS15288

Person ID 1161497

Full Name Mr Robert Sellwood

Organisation Details The Crown Estate

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Employment Development comment TCE's responses on this Chapter should be read in the context of The Crown's comments on Policy SP5 and how the evidence base does not support the assumption that 84,000 m2 of DBC's office shortfall can be met at East Hemel in St Albans District. Whilst TCE has few comments on the detail of Chapter 15 itself, the policies should be viewed in the context of this overarching strategic concern about unsoundness.

Included files

Title Employment Development

ID EGS15590

Person ID 1271610

Full Name MR SIMON MILLIKEN

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>EH Smith note that Bovingdon Brickworks is included under Table 19: 'General Employment Areas' . Whilst the reference to the Bovingdon Brickwork site is SUPPORTED, it is evident from the 'Draft Proposals Map' that the boundary also includes the EH Smith Builder' s Merchants site and the adjoining Pudds Cross Industrial Estate/ Loveday Aggregates (as per the existing Major Development Site boundary). The reference to Bovingdon Brickworks, therefore, needs to be AMENDED to include these separate land uses as part of the 'General Employment Area ' .</p> <p>Given that EH Smith's open storage area also has the benefit of a Lawful Development Certificate for <i>Sui Generis</i> Builders Merchant's use, it is also considered that the boundary to the 'General Employment Area' should be AMENDED to include this part of EH Smith's landholding. We would, therefore, formally request that the 'Draft Proposals Map' is AMENDED to include the whole of EHS Builders Merchants landholding within the red line boundary of the 'General Employment Area'.</p>
Included files	
Title	Employment Development
ID	EGS15591
Person ID	1271610
Full Name	MR SIMON MILLIKEN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Employment Development comment	EH Smith SUPPORT the flexibility within Policy DM16 to allow for non-office industrial uses which are similar in nature to office, industrial and warehousing uses; namely those uses which would strengthen its economic role; would not undermine its role as an employment and economic centre; and would provide important services and facilities which would enhance its attractiveness as an economic centre (Point 2). Further, EH Smith's SUPPORT the list within Policy DM16 that acceptable uses may include ' <i>sui generis</i> ' uses (such as a Builders Merchants use) that are similar in nature to office, Industrial and warehousing uses along with public houses and takeaways; hotels; trade counter uses, and community uses, such as nurseries and creches (Point 3).
Included files	
Title	Employment Development
ID	EGS15737
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>Buncefield Hemel Hempstead</p> <p>Recognised ecology sites within Site</p> <p>Yes, part of 'Buncefield Oil Depot and Punch Bowl Lane Pastures' Ecosite.</p> <p>Recognised sites adjacent/ close to site</p> <p>Yes, adjacent to remaining part of 'Buncefield Oil Depot and Punch Bowl Lane Pastures' Ecosite</p> <p>Other features</p> <p>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.</p>

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 western and eastern edges. 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)

Consider measures to achieve net gain.

Ecological sensitivity

Low. Avoid light spill on trees / hedgerows

Fundamental ecological constraint

None apparent. Preliminary Roost Assessment may be required

Included files**Title**

Employment Development

ID

EGS15740

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

Employment Development comment

Paradise Est
Recognised ecology sites within Site
NO

Recognised sites adjacent/ close to site
 Adjacent to 'Paradise Fields Central' LWS.
 Other features
 Previously developed land. Mature boundary hedgerow on northern and eastern sides. Scattered trees throughout existing development.
 Protected species
 Bats (including roosts) 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 hedgerows. Buffer adjacent LWS on the eastern side. 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 boundary hedgerows and adjacent habitats.
 Fundamental ecological constraint
 None apparent. Preliminary Roost Assessment may be required.

Included files

Title	Employment Development
ID	EGS15742
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	

Employment Development comment	<p>Plots 2 & 3 Kier Park Maylands Avenue</p> <p>Recognised ecology sites within Site</p> <p>NO</p> <p>Recognised sites adjacent/ close to site</p> <p>NO</p> <p>Other features</p> <p>Undeveloped plots with rough grass and colonising vegetation; some hardstanding. Mature woodland strip beyond the western boundary.</p> <p>Protected species</p> <p>Unlikely</p> <p>Opportunities</p> <p>Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p> <p>Biodiversity Net Gain (BNG)</p> <p>Consider measures to achieve net gain.</p> <p>Ecological sensitivity</p> <p>Low. Avoid light spill on adjacent trees / woody habitats.</p> <p>Fundamental ecological constraint</p> <p>None apparent.</p>
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Included files	
Title	Employment Development
ID	EGS15743
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Employment Development comment	<p>Dunsley Farm</p> <p>Recognised ecology sites within Site Yes, 'Cow Lane Farm Meadows' LWS.</p> <p>Recognised sites adjacent/ close to site Adjacent to 'Dunsley Bungalow Orchard & Pasture' LWS.</p> <p>Other features 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>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.</p> <p>Opportunities 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>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 hereof.</p> <p>Ecological sensitivity High if LWS grassland lost.</p> <p>Fundamental ecological constraint Yes LWS. Ecological Appraisal and/or LWS quality survey may be required. Preliminary Roost Assessment of buildings and trees may be required.</p>
Included files	
Title	Employment Development
ID	EGS15745
Person ID	1207333

Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>Plough Zone North</p> <p>Recognised ecology sites within Site No</p> <p>Recognised sites adjacent/ close to site Within 20m of Boxmoor Common LWS and Common land but separated by Two Waters Road.</p> <p>Other features Previously developed land with buildings and Units on hardstanding.</p> <p>Protected species Unlikely although there may be potential for roosting bats in buildings if suitable roosting features are present.</p> <p>Opportunities Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p> <p>Biodiversity Net Gain (BNG) Consider measures to achieve net gain.</p> <p>Ecological sensitivity Low.</p> <p>Fundamental ecological constraint None. Preliminary Roost Assessment may be required.</p>
Included files	
Title	Employment Development

ID	EGS15747
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Employment Development comment	<p>MU/7</p> <p>Recognised ecology sites within Site No</p> <p>Recognised sites adjacent/ close to site No</p> <p>Other features Bare ground with bordering trees. Section of River Bulbourne on the northern boundary.</p> <p>Protected species Unlikely, although there may be potential for nesting birds in bordering trees.</p> <p>Opportunities Retain and enhance trees / hedgerows. Consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p> <p>Biodiversity Net Gain (BNG) Consider measures to achieve net gain.</p> <p>Ecological sensitivity Low.</p> <p>Fundamental ecological constraint None.</p>

Included files	
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16 Retailing and Other Town Centre uses responses

Title	Retailing and Other Town Centre Uses
ID	EGS13
Person ID	1253652
Full Name	erica vilkauls
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Retail is in crisis and will never get back to how it was. believe me, I'm a retail CEO. This plan is naive and ill-informed. You can't make people start up businesses so you wil potentially be building swathes of buildings which wil remain empty. A terrible blight on the countryside for nothing
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS50
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Retailing and other town centre uses comment	<p>Policies DM19/DM21</p> <p>Many shops in the town centres have closed due to the rise in on line shopping unfortunately. But the Apsley retail park seems to perform quite well. As for town centres the loss of many big home sales departments has hit hard as well. Once again maybe the businesses rates needs to be reviewed. Look at the type of businesses that are doing well. This appears to be the lower priced goods departments rather than the high end of the market goods.</p> <p>Hemel has no main performing arts centre since the pavilion was closed down while Tring has the Rose Court and Berkhamstead has the old town hall. We have lost 2 big leisure amenities with the bowling alley and the splash water park. Where in the plans are the proposals to reinstate these types of leisure activities. The old Hemel high street attracts quite a lot of people in the evening due to the public houses and restaurants so maybe adding more into the town centre may not work. People can only eat and drink so much. The once mentioned conference centre at Jarmans Park never materialised, which could have bought in revenue to Dacorum. Are there any plans for that piece of waste land??? Maybe local shopping parades could have an evening restaurant sited amongst them like the Sitar in boxmoor or the Sahara at Gadebridge to provide a local spot for a night out rather than a public house..</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS92
Person ID	1255447
Full Name	Andrew Sparrow
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Please do not allow housing development in the centre of towns to take precedence over existing land use - e.g. the proposed sale for housing of the football club at Broadwater in the town centre of Berkhamsted/
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS258
Person ID	1207707

Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Neighbourhood shops have proved to very useful during the pandemic. Landlords must be prevented from driving out small retailers to convert premises to something more lucrative such as housing.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS373
Person ID	1260058
Full Name	Redbourn Parish Council
Organisation Details	
Agent ID	1260042
Agent Name	David Mitchell
Agent Organisation	Redbourn Parish Council
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS459
Person ID	1258240

Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	A bank, in a town centre? How novel. Is Hemel Hempstead ever going to get a main performance venue/mixed use space? The proposal to build on the site of an existing and well used football club is awful. Shouldn't our centres be varied and vibrant ie, not just shops and tiny residences?
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS522
Person ID	1260809
Full Name	James Mac
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	How are you going to ensure that town centres remain vibrant and attractive when we are seeing many shops closed down and a reduction in retail activity due to increased online purchases?
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS552

Person ID	1260940
Full Name	Robert Court
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Referring to the large area planned for development in Tring, to the East of the town up to the Grand Union canal: This area will have many houses, are there any plans to include local shops for this area? If not then all habitants will need to go to the High Street for any basic needs. Most would not consider it 'walking' distance to the town centre and will therefore drive. This is against all logic and environmental considerations. Where will they park?
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS603
Person ID	1261122
Full Name	Mark Slade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	Should be left to market forces
Included files	
Title	Retailing and Other Town Centre Uses

ID	EGS639
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	<p>Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.</p> <p>My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.</p> <p>The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.</p> <p>Tring is a commuter town and a (significant) proportion of new inhabitants will likely commute to London on a trainline already at capacity. Station car parks are full before rush hour is over - where is the proposal to increase that capacity? You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by such radical numbers will result in far more congestion and pollution – flying directly in the face of your environment plan. It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.</p> <p>Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between properties, minimal parking and a minimal green space. Once they have been paid, they will leave and having irreparably changed the face of the town, we, and future generations will be left to suffer the consequences.</p>

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	Retailing and Other Town Centre Uses
ID	EGS736
Person ID	1261250
Full Name	Christina Thompson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	will this strtsegy be reviewed following the coronavirus pandemic?
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS878
Person ID	1261462
Full Name	S LAU
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Policy DM19: There isn't enough description of the type of retail the policy plan to attract. The past 12 months of covid 19 pandemic has demonstrated the importance of providing residents more access to essential businesses within walking distance and not just focus on town centres, there should be a review in this policy to look at the impact of covid to local independent businesses. There is a demand to support small scale independent businesses and more emphasis should be made in how to bring these into the Old town, and extend into the Marlowe. Schemes such as Brunswick centre, Islington high street where a mixture of high street and independent store and restaurants create an exciting destination that is more pedestrian orientated and offer residents more than just the essentials but create a special cohesive street fabric that enlivens the neighbourhood. Neighbourhood centres were so critical to the communities during the pandemic and more should be done in the policy not just to protect the existing outlets but should review each individual areas and identify opportunities to create spaces for F&B use like cafes to serve the local community. Shops selling takeaway or convenience goods are all transient where as well placed F& B outlets can create local destinations for residents.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS1126
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS1240
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS1301
Person ID	1261957
Full Name	Jeremy Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	As a result of the growth in online business accelerated by Covid-19 we are seeing a decline in retail in our town centres. The government is changing planning laws to facilitate the conversion of former retail units in town centres to residential accommodation. These changes should be taken account of when considering the need for new housing and should reduce the amount of greenfield development.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS1316
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	DM19, DM20 and DM64. For Tring, I support local shops, Halls and meeting spaces. NB LA5 has been developed with no apparant provision. Future housing developments should include such in the built mix. Tring High Street is under pressure. Retail units have been lost to offices and residential uses. Every effort, including business rate support, should be made to encourage local provision.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS1333
Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Retail should be converted to housing
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS1503
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS1605
Person ID	1261385
Full Name	stephen hearn
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p>Growth area TR06 – off Brook Street Tring</p> <p>TR06 comprises Tring Market Auctions, The Tring Local History Museum, the Fire Station and Forge Car Park.</p> <p>Tring Market Auctions is located at the rear of the site of TR06 with access from Brook Street and a license to access the Forge Car Park.</p> <p>The ownership of the site is divided between Tring Town Council (Auction Rooms, Museum and the Market Place <i>hardstanding area</i>), Dacorum Borough Council (Forge Car Park) and Herts County Council (The Fire Station). The Freehold ownerships make it a somewhat complicated issue should planning proceed.</p> <p>In the proposal, no mention has been made for Tring Market Auctions to be included in the future plans of TR06, but mention has been made that if the site is re-developed Tring Market Auctions would be offered an alternative site in the town – where? The Auctions currently comprise about 16000 sq ft of buildings alone together with the adjoining parking areas. No detail has been provided and no mention of re-location provisions has been made. It appears the proposals are an afterthought to the Dacorum local plan. Tring Market Auctions occupy under the terms of a lease with Tring Town Council.</p> <p><u>The History and Current use of the Site</u></p> <p>In 1893 under the requirements of the Board of Agriculture and with the assistance of Lord Rothschild, the sale room with office was constructed in Brook Street. It was let to W Brown & Co. who conducted the first sale by auction in January 1894, since when auctions and sales have been held continually on the site for over 125 years – surely this qualifies the location to be part of Tring’s heritage.</p> <p>During recent years from 1960 there has been numerous enquiries and planning applications to develop the site with offices and supermarkets together with residential, all of which have been rejected.</p> <p>In 1993 the livestock auction ceased to operate leaving the chattel auction business to continue and flourish under the directorship of Stephen Hearn who took Tring Market Auctions to become independent and grow into the fine company it is today.</p> <p>It now has an extensive complex of four Auction Rooms, forming one of the largest and best known venues of its type in the Home Counties.</p> <p>The sales attract a very large number of vendors and buyers from Tring and the surrounding towns and villages together with an ever-growing number of people from throughout the Home Counties and Internationally. Many of the buyers represent the trade and other specialist collectors in all categories.</p>

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

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

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

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

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

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

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

Points of Consideration

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

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Planning Matters for Consideration

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

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

Included files

Title Retailing and Other Town Centre Uses

ID EGS1642

Person ID 1262323

Full Name Emma Hilder

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
 * Yes
 * No

Retailing and other town centre uses comment

Included files

Title	Retailing and Other Town Centre Uses
ID	EGS1813
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS1833
Person ID	488516
Full Name	mr hugh siegle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Overall the draft Plan is very light on culture. The Conservative should honour their promise to replace the Pavillion
Included files	

Title	Retailing and Other Town Centre Uses
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ID	EGS1918
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	See my earlier comments about the impact of Covid-19 on this sector. Do we really need more retail in eg Hemel town centre?
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS1991
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	DM-20 There is no substance here.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2015

Person ID	1262601
Full Name	Anne Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2058
Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2093
Person ID	1262755

Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Retailing and Other Town Centre Uses. Landlords should be encouraged to keep their rents at a reasonable level. Many shops in berkhamsted have closed because they cannot afford the rents. This is bad for the high street and we now have a disproportionate number of charity shops and flooring style shops filling units some of which would be better placed on the industrial estate. Lack of good varied shops shrinks the town foot fall which is bad for the other shops as there are less people making impulse purchase and purchase power coming into the town. I think a Lidl or Aldi would be helpful in the old chapmans car site as it will fulfill a shopping need for more basic food at a different price point offering the whole town variety providing it is built sympathetically to the character of the town rather than some hideous concrete structure as far as possible. These things can be done nicely.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2138
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Tring has already lost 3 restaurants in Tring to COVID and, as I said before we have no banks at all. Fortunately we have a few very good local retailers but I would not want them to be impacted by a bigger competitor being brought in. Furthermore, I can see no way that introducing nightclubs, bowling centres and bingo halls could enrich the current Tring

environment. To be honest they are more than likely to bring in trouble to a very small centre. To be honest you seem to have shown no interest in encouraging retail outlets into Tring over many years. I have no faith that this will change.

Included files

Title Retailing and Other Town Centre Uses

ID EGS2267

Person ID 1262925

Full Name Nandipha Jordan

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Retailing and other town centre uses comment There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:

- (i) the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility;
- (ii) the proposal would not result in the loss of a service or facility of value to the local community; and
- (iii) community ownership should be preferred to change of use/redevelopment and/or demolition.

Included files

Title Retailing and Other Town Centre Uses

ID EGS2293

Person ID 610662

Full Name Mr Antony Harbidge

Organisation Details Chairman
Berkhamsted Residents Action Group (BRAG)

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	BRAG broadly supports the Council, though there is a lack of vision and ambition with regards to promoting cultural and performing arts. If DBC are serious about the massive growth targets and the claimed positive impacts of the Garden Communities, then surely it is time to plan a replacement for the Pavilion, which closed in 2002.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2331
Person ID	1261830
Full Name	alistair budd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2379
Person ID	1254107
Full Name	Polly Eaton
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>Office space should be in keeping with current global trends i.e. flexible office and meeting space. Businesses on these sites need to meet environmental credentials to fulfil carbon zero aspirations and can achieve these with methods such as heating, recycling, solar power installation. No fossil fuel should be used.</p> <p>This space should also include green space (biodiverse) for the benefit of employees and public visiting this area, and NOT entirely concrete!</p> <p>Cycling should be the preferred comuter transport, provision of cycle priority lanes, bike parking, showers are methods to enourage this.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2381
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2417

Person ID	1227518
Full Name	Mr John LOWRIE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Retail high streets are changing. Perhaps space provided for shops can be changed for housing. I'm thinking the Debenhams site would be ideal for housing.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2425
Person ID	1262981
Full Name	Chris Mabley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Leisure facilities used to be part of Hemel Hempstead Town Centre eg bowling and quasar, a positive business rates strategy needs to be incorporated into plans to support redevelopment and diversification of use.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2601

Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2633
Person ID	222269
Full Name	Georgina Tregoning
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2752

Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Table 22. Not clear if Berkhamsted and Northchurch will have multiple areas of scattered shops.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2773
Person ID	1262722
Full Name	Colin McCready
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2797
Person ID	1262731

Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	I would like to add the suggestion that Dunsley Farm would make an excellent small retail centre as part of an artisanal craft hub (workshop and small specialist retail outlet combined) supporting tourism and local interest in artisanal products as it is already known for local beer making and quality farm produce.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2877
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 * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2908

Person ID	1263430
Full Name	Pru Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	We definitely need a couple of neighbourhood centres - in South Berkhamsted and maybe East Berkhamsted to relieve pressure on the town centre and encourage small communities to develop. I think the same applies in Tring too.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS2929
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3225
Person ID	1263566

Full Name	Frances Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3351
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3379
Person ID	1261609
Full Name	DEBORAH CROOKS

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3410
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	No Comment
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3429
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3505
Person ID	1263810
Full Name	David Tolfree
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3547
Person ID	1263821
Full Name	Anne Isherwood
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3582
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3605
Person ID	1263865
Full Name	Robin McMorran
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	A bit pointless now that the Tories have shafted local businesses with increased business rates.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3714
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	Waste of time, it will not be used. people will flock to berkhamsted highstreet
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3727
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3775
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3834
Person ID	1263924
Full Name	Susan Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>Retail patterns have dramatically changed over the last 5-10 years and shopping centres have fallen into decline. People need leisure and cultural facilities, places to meet and socialise and experience green spaces within their town centres. More retail development is therefore unnecessary.</p> <p>Regeneration of town centres to provide local hubs / office space and residential property alongside leisure facilities will provide a basis for communities to thrive in a vibrant centre rather than the desolate shopping malls of today. Open up the high street and restyle it for everyone - not just shoppers.</p> <p>The cost of regeneration to the environment in connection with the amount of energy used to make steel and concrete for new roads and dwellings of New builds far outweighs the energy used to regenerate a town.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3869
Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3940
Person ID	1264025
Full Name	Caroline Sherwen

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3972
Person ID	1263440
Full Name	J Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS3976
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4067
Person ID	1263883
Full Name	New Gospel Hall Trust
Organisation Details	New Gospel Hall Trust
Agent ID	1263872
Agent Name	John john.shephard@jjdesign.org.uk
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	New Gospel Hall Trust concurs with the identification of Places of Worship together with Libraries and public halls as falling within Use Class F1: Learning and Non-residential Institutions, as set out in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. However, the Trust would challenge the basis for including Places of Worship in Table 21 – Appropriate Uses in Town, District and Local Centres and the text at paragraph 16.9. Framework paragraph 31 advises that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence; which should be adequate and, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. The Trust has been unable to find any such evidence to support the above policy stance including the draft policy DM19 and the associated locational issues. Nonetheless, the Trust notes that the draft policy DM19 is permissive rather than prescriptive. It should not be assumed that Policy DM19 is promoting Upper Floors in primary shopping areas and elsewhere in town and district Centres and local Centres as a preferred location for places of worship. We would submit that whilst some faith communities may accept such locations, for others the prospective

mix of uses would be inimical to regular gatherings for worship and prayer especially on Sundays and weekday evenings. In reality, there will be a wide range of faith community needs which may be appropriate in a town, district or local centre but this will not be seen as a preferred location for others.

Included files

Title Retailing and Other Town Centre Uses

ID EGS4102

Person ID 1264210

Full Name Fiona Fulford

Organisation Details myself

Agent ID 1264200

Agent Name Fiona
Fulford

Agent Organisation

Yes / No Yes
* Yes
* No

Retailing and other town centre uses comment Business rates need to be reduced or supplemented somehow to try to support local small businesses against online competition, otherwise we will have empty local high streets other than charity and coffee shops. Similarly local parking needs to be cheaper for short stays

Included files

Title Retailing and Other Town Centre Uses

ID EGS4138

Person ID 1262892

Full Name Jean Farrer

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes	
* No	
Retailing and other town centre uses comment	I support BRAG and the rest of the One Voice Alliance here.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4168
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Retailing and other town centre uses comment	At a time when no one knows what the future holds for the retail and hospitality sectors, any form of prediction/plan is a complete waste of time.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4263
Person ID	1264269
Full Name	Paul de Hoest
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
Retailing and other town centre uses comment	Numerous local groups have commented on this consultation including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party to name a few. I agree with the stance taken by all of these groups. The fact that all these (and there will be others) are providing the same substantive message from the local population to you should demonstrate that these proposals do not have the support of the people. I do not propose to add to your reading burden by rehashing all of their points
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4297
Person ID	1264321
Full Name	David` Fox
Organisation Details	personal
Agent ID	1264318
Agent Name	David Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Business rates need to be reduced or supplemented somehow to try to support local small businesses against online competition, otherwise we will have local high streets empty other than charity and coffee shops. Similarly, local parking needs to be cheaper for short stay visits to encourage local convenience shopping.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4324
Person ID	1264325
Full Name	Olivia Halper
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>16.8 Need to emphasise the community function and increase in employment uses in centres.</p> <p>DM19: How does this policy apply to smaller scale local centres (as referred to in SP6)? Not clear.</p> <p>DM19 5a) The other acceptable uses (Table 21) should be permitted on ground floors of centres. Also, business uses should not be limited to ‘financial and professional services’– Any business/workshop that provides an active frontage should be acceptable for centre.</p> <p>DM21 4) ‘Well-connected’ needs to specify by walking, cycling and public transport.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4408
Person ID	1264312
Full Name	Angela Delglyn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Priority rates should be given to locals who wish to run their business locally, as they are directly contributing to the overall community energy of the town, bringing their own brand of sustainability. Please support local people dear planners!
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS4437
Person ID	1207786
Full Name	Anne Foster
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS4459
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	

Title	Retailing and Other Town Centre Uses
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ID	EGS4528
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>My family and I moved to Dacorum in 2018 to settle in Berkhamsted for at least the next 25 years. Over this time, we look forward to developing ever stronger links throughout the community and watching our young children grow to adulthood. As such, we have a vested interest in seeing the Borough grow in a way that works for all its citizens – both existing and new.</p> <p>Against this backdrop, I wish to formally state my strong objections to the ‘Dacorum Local Plan (2020-2038) Emerging Strategy for Growth’. The evidence suggests that, if this plan is approved, your personal legacy will be of considerably worsening towns and communities within the Borough. For new residents moving to the area and for those already here. For all ages. And for all financial situations. I suspect you don’t want to be remembered after you leave this office as the person who caused such damage to an area. So, I ask you to fundamentally rethink.</p> <p>Due to the COVID-19 constraints on travel and mingling for the past year, my experience, and hence prime objection, focuses on the portions of the Local Plan relating to developments in the Berkhamsted area.</p> <p>To summarise:</p> <ol style="list-style-type: none"> 1. Flawed modelling of number and type of housing required would fail to meet the actual needs of the voters moving into the area, whilst disrupting those already here far more than is needed. 2. Inadequate commitment to transport infrastructure needs to accommodate the changes proposed would result in a legacy of decades of traffic congestion for voters in Dacorum and visitors to the area. 3. Insufficient provision of water supply, wastewater disposal and other infrastructure would leave households with shortages and damage the local water table, with knock-on considerations around subsidence and environmental impact. 4. Unworkable assumptions around public transport and foot / bike journeys would see considerable increase to carbon emissions in the Borough and considerable travel delays around vital transport hotspots (town centres, schools, rail stations, etc.). 5. The above worsening of conditions for the new and existing voters in the area also comes with an ecological cost due to the loss of green belt. If green belt is to be repurposed, it must be done in a way that makes the greatest positive impact for the current and future residents of Berkhamsted. This plan wastes that sacrifice.

These are fundamental flaws in the strategy underpinning the 'Dacorum Local Plan (2020-2038) Emerging Strategy for Growth'. As such, this plan should be rejected outright, and a new plan drawn up that addresses the actual needs of the area for today and the long-term success of the Borough.

These points are expanded below.

Incorrect Assumptions for Housing Provision

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

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

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

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

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

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

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

Failure to Provide Adequate Supportive Infrastructure

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

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

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

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

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

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

Impact on Green Belt and Other Designated Land

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

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

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

You are now faced with a personal choice.

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

Included files

Title	Retailing and Other Town Centre Uses
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ID	EGS4580
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Person ID	1145918
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Full Name	Mr Richard Tregoning
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Organisation Details

Agent ID	
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Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4664
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4802
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	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. Retail will look very different from 2021/22.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4874
Person ID	1264524
Full Name	Karen Kang
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS4972
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent ID	1264539
Agent Name	Bethan Fox

Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Business rates need to be reduced or supplemented somehow to try to support local small businesses against online competition, otherwise we will have local high streets empty other than charity and coffee shops. Similarly, local parking needs to be cheaper for short stay visits to encourage local convenience shopping.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5013
Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5059
Person ID	1264258
Full Name	Fintan FitzPatrick
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>There should be protection for public houses written into the local plan.</p> <p>Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that: (i) the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility; (ii) the proposal would not result in the loss of a service or facility of value to the local community; and (iii) community ownership should be preferred to change of use/redevelopment and/or demolition.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5112
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>Retailing and Other Town Centre Uses</p> <p>It is important to retain the town and village centres with both shopping and leisure opportunities such as cafes, restaurants, cinemas, markets as well as a range of shops (not predominantly charity and betting shops), as they create central areas where communities can meet and mingle. Business rates should be adjusted to encourage small individual businesses to survive.</p> <p>Where possible offices and empty large shops on the periphery could be changed into residential areas, to reduce pressure on the Green Belt.</p>

Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5115
Person ID	1264550
Full Name	Kevin Fielding
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5163
Person ID	1264509
Full Name	Hannah Fox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Business rates need to be reduced or supplemented somehow to try to support local small businesses against online competition, otherwise we will have local high streets empty other than charity and coffee shops. Similarly, local parking needs to be cheaper for short stay visits to encourage local convenience shopping

Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5197
Person ID	1264593
Full Name	Rebecca Mackenzie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5220
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Business rates need to be reduced or supplemented somehow to try to support local small businesses against online competition, otherwise we will have local high streets empty other than charity and coffee shops. Similarly, local parking needs to be cheaper for short stay visits to encourage local convenience shopping.

Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5287
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5333
Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS5353
Person ID	1264363
Full Name	Roselyn King
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Re DM21: I don't think there is any need for more retail space at Jarman Park. In addition, proposals to build a hotel there seem unlikely to ever materialise, and any demand for leisure uses and restaurants could be met in Hemel's town centre, which could arguably be a better location for them as it has better transport connections.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5365
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS5436
Person ID	1264628
Full Name	sophie boden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	I think table 23 is sensible. Would be good to know more about this as I don't think it has been covered in enough detail.
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS5457
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	I don't live there; but the expanding Manor Estate would seem to be in want of a shop and a community centre.
Included files	

Title	Retailing and Other Town Centre Uses
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ID	EGS5470
Person ID	1264648
Full Name	Lydia Whelan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	The High Street retail trade in Tring is already under pressure and the road surface shows serious wear - both need active investment if the town is to return to the vibrant centre it once. Yes - we do need another supermarket in the centre but lets not lose the independent trades - they make the town unique. Traffic flow needs to be managed and free car parking needs to be maintained
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5476
Person ID	1264647
Full Name	Richard Burnell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	This strategy appears out of date now and no longer valid.
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS5524
Person ID	1264502
Full Name	R Phipps
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	16.7Agree
Included files	

Title	Retailing and Other Town Centre Uses
ID	EGS5538
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	

Title	Retailing and Other Town Centre Uses
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ID	EGS5650
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5661
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	The Plan should be revised to take account of the pandemic and its consequences upon town centres. Needs as well as behaviours have changed and will continue to change and the current Plan may not accurately reflect those changes.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5740

Person ID	1264733
Full Name	Nick Cave
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>Impact of development on Tring town centre and town centre residential dwellings.</p> <p>The proposals for Tring need to assess and put in place proper arrangements for parking in the town centre. Continued change of light industrial into residential in the town centre, combined with the relaxation of change of use legislation and increased use of local amenities such as the museum have created parking problems and are impacting significantly on the quality of life for local people in these settings.</p> <p>The plans need to identify solutions such as residential parking and controlled zones for these historic areas of the town.</p> <p>Growth area TR06 – off Brook Street Tring</p> <p>TR06 comprises Tring Market Auctions, The Tring Local History Museum, the Fire Station and Forge Car Park.</p> <p>Tring Market Auctions is located at the rear of the site of TR06 with access from Brook Street and a license to access the Forge Car Park.</p> <p>The ownership of the site is divided between Tring Town Council (Auction Rooms, Museum and the Market Place <i>hardstanding area</i>), Dacorum Borough Council (Forge Car Park) and Herts County Council (The Fire Station). The Freehold ownerships make it a somewhat complicated issue should planning proceed.</p> <p>In the proposal, no mention has been made for Tring Market Auctions to be included in the future plans of TR06, but mention has been made that if the site is re-developed Tring Market Auctions would be offered an alternative site in the town – where? The Auctions currently comprise about 16000 sq ft of buildings alone together with the adjoining parking areas. No detail has been provided and no mention of re-location provisions has been made. It appears the proposals are an afterthought to the Dacorum local plan. Tring Market Auctions occupy under the terms of a lease with Tring Town Council.</p> <p><u>The History and Current use of the Site</u></p>

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 refused.

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 Way. 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 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

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	Retailing and Other Town Centre Uses

ID	EGS5749
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5847
Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Tring town centre is currently suffering from a relatively large number of empty shops. The type of future businesses to fill these should be explored before any additional locations are explored.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5866

Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	No mention of post Covid world. Where retail shops cannot be supported they should be considered as offices first not released into accommodation. More detailed comments further down when it comes to sites.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5872
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Retail has changed considerably over recent years. During the past twelve months, many national chains have disappeared. More and more consumers are happy to 'buy on-line'. It is my opinion that investing in retail parks and shopping centres, is a waste. DBC should stop perusing the few large retail chains that are left and look at alternatives.
Included files	
Title	Retailing and Other Town Centre Uses

ID	EGS5883
Person ID	1264354
Full Name	Juliet Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Unfortunately I suspect that all of the assumptions in this section are outdated following the pandemic with: the economy contracting (at least in the short term); increased pressure on business investment (rent rebates ending, corporation tax increasing, increasing online business etc); more home working/ hot desking etc.. These assumptions need to be revisited in 2022/23 once the dust has hopefully settled.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS5960
Person ID	1264787
Full Name	Sam Markey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	I think it is highly likely that local retail will see a modest resurgence post-lockdown, with more people seeing the value of being able to access a range of essential and general stores within walking distance. I am sure that Dacorum's planners are thinking carefully about how our collective experience of the pandemic might affect user demand across different aspects of the local plan and I would be interested to see more about how plans in development since 2017 are being

adapted for the future in light of the last year - not just with regards to high streets and retail, but also access to green space, enabling greater active travel etc.

For example, I wonder what option there might be to close a section of Berkhamsted high street on a regular basis to allow for creative use of the space by local businesses and the community, as happens at the annual Festival of Light?

Included files

Title Retailing and Other Town Centre Uses

ID EGS6097

Person ID 1264816

Full Name Christopher Nicholls

Organisation Details

Agent ID

Agent Name

Agent Organisation

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

Retailing and other town centre uses comment

Included files

Title Retailing and Other Town Centre Uses

ID EGS6113

Person ID 1145998

Full Name Mrs Pauline Hughes

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* **Yes**

* No	
Retailing and other town centre uses comment	Happy to see Policy DM20 emphasis on shops to serve local community.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6191
Person ID	1264872
Full Name	Ben Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	Business rates need to be reduced or supplemented somehow to try to support local small businesses against online competition, otherwise we will have local high streets empty other than charity and coffee shops. Similarly, local parking needs to be cheaper for short stay visits to encourage local convenience shopping.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6220
Person ID	1261819
Full Name	Alex Rathmell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Retailing and other town centre uses comment	As outlined in previous responses
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6246
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6331
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Retailing and other town centre uses comment	Careful sustainable development applies to all areas not just retail in town centres. We favour mixed use because town centres are hubs for the villages that surround them.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6332
Person ID	1227391
Full Name	mrs caroline shaughnessy
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	To encourage post covid retail business back into Hemel Hempstead, one area that would support this would be to offer 4 hours free parking. Shoppers would bypass towns where fees to park are required (i do). In addition business enterprise scheme could apply for reduce rates or some profit based payment to get local buisneeses up and running in the town. Bespoke quaint shops and big name brands will help build economic growth but it has to build on a good reputation and not be a high street full of ONLY coffe shops, £ shops, charity shops, mobile phone and vaping shops. The old town area needs to encourage business suited to encourage visitors and free parking availbability would support this. By offering reduced rates etc to encourage growth, whislit it is a financial gamble surley it is better to support local businesses and creativity with reduce rates (for say year) than the premises being left empty and making the Town look unattractive and abandonded.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6382
Person ID	1262933
Full Name	James Cunningham
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6470
Person ID	1264936
Full Name	Jane Cracknell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6532
Person ID	1264697
Full Name	Nicholas Wood
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6585
Person ID	1263380
Full Name	Martin Warden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6603
Person ID	1265007
Full Name	Duncan Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	The increased number of local people (who already live in Berkhamsted) who are now working from home, will see increased trade for shops such as cafes from home workers who leave home to for example, have their lunch in a cafe, or work in cafes. Therefore, this trade will increase without any additional homes being built.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6786
Person ID	1265036
Full Name	Tom Burrows
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6894
Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6906
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS6962
Person ID	1265105
Full Name	Jonathan Tay
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS7062
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	I have already mentioned in an earlier comment that I believe that a performing arts venue ,similar to the previous one in Hemel, should be built in the Town Centre. It would draw people to the town and and support the economy of other businesses.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS7123
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Retailing and other town centre uses comment	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS7202
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS7241
Person ID	1264956
Full Name	Caroline Heard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	

* No	
Retailing and other town centre uses comment	
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS7307
Person ID	358532
Full Name	Ms Gillian Culham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	P96 Neighbourhood centre location – northchurch. This site is being used at present U3A – voting centre – front site -Gardening society – first aid teaching (further along the pathway) – where would these go if it was built on. There is parking available and within walking distance for many. There are or have been classes for children keep-fit – stitch – all the things that keep people well (mind or body) coffee mornings – all part of the community, something to KEEP.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS7737
Person ID	1265778
Full Name	Councillor Lara Pringle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	— 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	Retailing and Other Town Centre Uses
ID	EGS8679
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p>Policy DM19: Mix of uses in Town, District and Local Centres</p> <p><u>Library Services</u>. Public libraries across Dacorum are a key part of the community’s infrastructure across the borough. The county council welcomes the fact the draft policy recognises that public libraries are an important part of the local community infrastructure and help to underpin local, neighbourhood and village centres. The recognition of libraries as being an appropriate use of space in town, district and local centres is also</p> <p>However, the policy also appears to imply that public libraries, as a Class F1 use, will only be permitted on the upper floors of primary shopping areas and ‘elsewhere in town and district centres.’ This implies that libraries will only be permitted outside of the main hub of town centres, and ground floors of shopping centres that are reserved exclusively for shops, financial and professional services, cafes and restaurants and gyms. If the future needs of an increasing population within Dacorum should require re-provisioning of a public library, a restriction that does not permit the service to be available on the ground floor, or within a main shopping centre hub, has the potential to create significant access issues for large parts of the local population, including young families, elderly people and people with disabilities.</p> <p>Public libraries that are based in the centre of main high streets and on the ground floor of shopping centres have a greater rate of use by more local residents than libraries based on upper floors or outside of shopping centre There is</p>

also evidence that libraries encourage greater retail use due to the high level of footfall generated by libraries. Easily accessible libraries that are based in the centre of main high streets provide the greatest benefit to local communities, enriching people's lives, supporting health and wellbeing, and underpinning community cohesion.

Neighbourhood centres and scattered local shops

Transport. Local shops and scattered neighbourhood centres provide obvious destinations for short local trips that could be achieved by walking and cycling. These routes should be protected and enhanced where possible, and suitable high-quality cycle parking provided where possible.

Included files

Title Retailing and Other Town Centre Uses

ID EGS9260

Person ID 1267329

Full Name MARTIN DAVIES

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Retailing and other town centre uses comment — 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 Retailing and Other Town Centre Uses

ID EGS9306

Person ID 1267332

Full Name Nandi Jordan

Organisation Details Chair
 Berkhamsted and Tring Labour Party

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:</p> <p>(i) the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility;</p> <p>(ii) the proposal would not result in the loss of a service or facility of value to the local community; and</p> <p>(iii) community ownership should be preferred to change of use/redevelopment and/or demolition.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS10739
Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:</p> <ul style="list-style-type: none"> the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility; the proposal would not result in the loss of a service or facility of value to the local community; and community ownership should be preferred to change of use/redevelopment and/or demolition

Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS11443
Person ID	1264362
Full Name	Juliet Miller
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:</p> <ul style="list-style-type: none"> the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility; the proposal would not result in the loss of a service or facility of value to the local community; and community ownership should be preferred to change of use/redevelopment and/or
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS11487
Person ID	
Full Name	
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<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. 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. Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution. There should be control of polluted waters and discharge to non-mains drainage should be prohibited.</p> <p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS11682
Person ID	1269212
Full Name	PETER SCOTT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Retailing and other town centre uses comment	There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that: <ul style="list-style-type: none"> the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility; the proposal would not result in the loss of a service or facility of value to the local community; and community ownership should be preferred to change of use/redevelopment and/or
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS12126
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	
Retailing and other town centre uses comment	1 Retail and Other Town Centre Uses Policies DM19 to DM21 – Retail and Other Town Centre Uses No objections
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS12432
Person ID	1146040
Full Name	Mrs Rachel Macdonald

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<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 & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS12436
Person ID	1146040
Full Name	Mrs Rachel Macdonald
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p>Retailing and Other Town Centre Uses</p> <p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:</p>

- the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility;
- the proposal would not result in the loss of a service or facility of value to the local community; and
- community ownership should be preferred to change of use/redevelopment and/or demolition.

Included files

Title Retailing and Other Town Centre Uses

ID EGS12766

Person ID 1269621

Full Name Valentine Beresford

Organisation Details Director
Metric GP Income Plus Limited

Agent ID 1269622

Agent Name Jenny Hill

Agent Organisation Associate Director
Litchfields

Yes / No
* Yes
* No

Retailing and other town centre uses comment These representations to the Dacorum Local Plan Emerging Strategy for Growth are submitted on behalf of Metric GP Income Plus Limited ('Metric'). Metric own the Dunelm and Wickes stores on London Road, Apsley. The site is located to the south of Hemel Hempstead Town Centre, and on the edge of Apsley local centre. The site is adjacent to employment uses to the south east, and to Sainsburys supermarket and Apsley Mills Retail Park beyond. The River Bulbourne runs along the northern boundary of the site, with employment uses beyond.

[SEE ATTACHED FIGURE FOR AERIAL VIEW OF THE SITE]

Within the Local Plan Emerging Strategy for Growth, the boundary of Apsley local centre is proposed to be extended to include Metric's site, along with the Sainsbury's and Apsley Mills Retail Park, and the centre upgraded to district centre status. The proposals map also defines a primary shopping area for the new district centre, which includes the Metric site. Metric supports the extension of the centre boundary and the elevation of centre status to a district centre, which is a sensible approach given the presence of existing retail and main town centre uses. The designation as a district centre will allow the centre to grow and diversify and encourage its long-term vitality and viability, as promoted by the

NPPF. However, Metric question whether there is a need to also define the primary shopping area within the district centre.

Within the draft Local Plan, the strategy for future retail and leisure development is set out in Policy SP6. The draft Plan states that this change in the status of Apsley centre is justified, as this area plays an important role in meeting Hemel Hempstead's retail needs. The role of Apsley district centre is defined as the provision of local convenience and comparison shopping floorspace, services and leisure uses, and also meets some town-wide needs for retail warehouses. The policy recognises the different function that the district centre should fulfil, compared to the more day to day local offer.

Draft Policy DM19 encourages a mix of uses in town, district and local centres in order to protect and increase the vitality and viability of these centres, and the evening economy will be supported. The draft policy confirms that retail development will be concentrated mainly in the primary shopping areas, and that development in these areas should provide an active ground floor frontage and planning permissions will normally be subject to a condition to achieve this.

The draft policy seeks to restrict the ground floor level in primary shopping areas to the following uses:

- shops, financial and professional services, cafes and restaurants, gyms, but not other uses within use class E (commercial, business and service);
- bars and pubs, hot food

At the upper floor level in primary shopping areas and elsewhere in town and district centres, and in local centres the range of uses permitted is much wider, including the uses above, together with leisure and entertainment uses, Class F1 uses, hotels, medical uses, offices, other appropriate uses such as amusement centres and betting offices, and housing.

While Metric agree that it is appropriate for primary retail areas to be the main focus of retail uses in town centres, within Apsley district centre this designation is not necessary, and there should be flexibility for a greater range of uses throughout the centre, in order to allow it to evolve and diversify over time and become a more cohesive centre.

In summary, Metric support the elevation of Apsley from a local centre to a district centre, and support the aspirations of draft policies SP6 and DM19, however do not consider that the definition of a primary shopping area within Apsley district centre is necessary and request its deletion.

We would be grateful if the above comments could be taken into consideration in the next stage of Local Plan preparation.

Included files	Metric GP Income Plus Ltd - Agent Jenny Hill Lichfields - site google map.pdf
Title	Retailing and Other Town Centre Uses
ID	EGS13050
Person ID	1270013
Full Name	Mr Daniel Ritchie
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:</p> <ul style="list-style-type: none"> the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility; the proposal would not result in the loss of a service or facility of value to the local community; and community ownership should be preferred to change of use/redevelopment and/or demolition.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS13467
Person ID	1270266
Full Name	VANDA EMERY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	3) Yes we our high streets and local shops are important, but if we want to keep them we need to stop allow 'retail parks' to be built. This need is reinforced by the needs for (to reduce carbon omissins) for more shopping trips to be by walking,

cycling, and public transport. This means we need less big shops with massive car parks outside, and more small shops (e.g. in high streets) which people can walk to or cycle to.

Included files

Title Retailing and Other Town Centre Uses

ID EGS13546

Person ID 1260521

Full Name Steve Ritchie

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Retailing and other town centre uses comment There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:

- the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility;
- the proposal would not result in the loss of a service or facility of value to the local community; and
- community ownership should be preferred to change of use/redevelopment and/or demolition

Included files

Title Retailing and Other Town Centre Uses

ID EGS13619

Person ID

Full Name

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p>Bourne Leisure recognises that town centres are in a state of evolution and their role and function has changed throughout the years. Within the emerging Local Plan, there is a strong opportunity to establish positive policies that reinforce the role of a town centre at the heart of a community and to maximise the sustainable location as part of a wider spatial strategy across Dacorum. Greater flexibility and range of uses in the town centre will ensure to the continued and strengthened vitality of the area. In this context, the Company endorses emerging 'Policy DM19 - Mix of uses in Town, District and Local Centres' which will encourage a wide range of main town centre uses, including the support of the evening economy. Such uses include shopping, leisure and entertainment, hotels, medical uses, learning and non-residential institutions, local community uses, and other appropriate uses such as betting offices and housing. Such an approach is consistent with Paragraph 85 of the National Planning Policy Framework.</p> <p>The inclusion of 1 Park Lane within the town centre boundary is also endorsed.</p> <p>Whilst fully supportive of the proposed mix of uses set out in draft Policy DM19 as a general principle the Company wants to ensure the amenity of neighbouring uses is protected commensurate with the town centre role. The protection of amenity is mentioned throughout the emerging plan primarily focusing on the protection of residential amenity. Such recognition of the need to protect neighbouring users should extend</p> <p>Registered in England No. 2778116</p> <p>beyond residential amenity and instead the impacts of development should be broadened to consider all local amenity. There is an opportunity within the emerging policy to include this consideration in the determination of planning applications within the town centres. Paragraph 180 of the National Planning Policy Framework requires that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment. On this basis, additional text (in bold) is proposed as set out below:</p> <p><i>Policy DM19 - Mix of uses in Town, District and Local Centres</i></p>

- 1 *A wide range of 'main town centre uses' as defined in national guidance and other appropriate uses will be encouraged in the town centres (Hemel Hempstead, Berkhamsted and Tring), district centres (Hemel Hempstead Old Town and Apsley) and local centres (Adeyfield, Bennetts End, Maylands, Woodhall Farm, Bovingdon and Kings Langley), in order to protect and increase the vitality and viability of these centres. The evening economy will be*
- 2 *The Policies Map shows the boundaries of the: Town, district and local centres b. Primary shopping areas in the town and district centres*
- 3 *Retail development will be concentrated mainly in the primary shopping*
- 4 *Development in the primary shopping areas and in existing shopping areas in local centres should provide an active ground floor frontage and planning permissions will normally be subject to a condition to achieve*
- 5 *The mix of uses in town, district and local centres should accord with the guidance below*
 - 1 *Ground floor level in primary shopping areas the following uses will be permitted:*
 - 1 *Shops, financial and professional services, cafes and restaurants, gyms, but not other uses within use class E (commercial, business and service)*
 - 2 *Bars and pubs, hot food takeaways*
 - 2 *Upper floors in primary shopping areas, elsewhere in town and district centres, and in local centres the following uses will be permitted:*
 - 1 *Uses acceptable at ground floor level in primary shopping areas*
 - 2 *Leisure and entertainment uses, such as cinemas, theatres, concert halls and dance halls*
 - *Class F1 uses (learning and non-residential institutions), including museums, libraries and places of worship*
 - 1 *Hotels, boarding houses and guest houses*
 - 2 *Medical uses, such as clinics and health centres*
 - 3 *Offices*
 - *Other appropriate uses such as amusement centres and betting offices*
 - *Housing*

Included files

Title Retailing and Other Town Centre Uses

ID EGS13678

Person ID 1207133

Full Name Chilterns Conservation Board

Organisation Details Chilterns Conservation Board

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>DM21 Town centre uses outside existing centres Object.</p> <p>The CCB is concerned that policy DM21 does not provide for the development of small-scale retail and other “town centre uses” that could be appropriate as part of farm diversification schemes, which can be important to residents and local economies in rural areas, including within the Chilterns AONB. CCB’s officers would be willing to assist DBC with drafting appropriate wording.</p> <p>Conversely, we are not convinced that the policy provides enough discouragement against major out- of-town retail in the AONB or its setting, as the harm that is addressed by this particular policy is related to impacts on other retail centres, rather than on the environment. We recognise that other policies, such as DM27, may be intended to provide this protection.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS13895
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p>Retailing and Other Town Centre Uses</p> <p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:</p> <ul style="list-style-type: none"> the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility;

- the proposal would not result in the loss of a service or facility of value to the local community; and
- community ownership should be preferred to change of use/redevelopment and/or demolition.

Included files

Title Retailing and Other Town Centre Uses

ID EGS14254

Person ID 1152075

Full Name Rob Wakely

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Retailing and other town centre uses comment

There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:

- the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility;
- the proposal would not result in the loss of a service or facility of value to the local community; and
- community ownership should be preferred to change of use/redevelopment and/or

Included files

Title Retailing and Other Town Centre Uses

ID EGS14526

Person ID 1270690

Full Name	Akzo Nobel CIF Nominees Ltd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p>Our client supports Policy DM19 and the provision of wide range of main town centres uses and other appropriate uses within the town centres, including Berkhamsted town centre. Our client further supports that new retail development will be concentrated in the primary shopping areas. However, Policy DM19 part 5(a) fails to include the full range of uses permitted under new Use Class E: 'Commercial, Business and Service' and therefore limits the flexibility this use class is intended to offer retailers in interests of supporting the vitality and viability of town centres. This policy should be amended to ensure it is effective and justified.</p> <p>Our client also supports the Council's pragmatic approach to the flexible use of upper floors in primary shopping areas to provide a broad range of retail uses including shops, gyms, leisure, entertainment, learning and Class F1: learning and non-residential institutions and places of worship, hotels, medical uses, offices, housing and other appropriate uses. This approach offers much needed flexibility for retailers.</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS14566
Person ID	1270700
Full Name	Mr Peter Sims
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Retailing and other town centre uses comment	<ul style="list-style-type: none"> Yes we our high streets and local shops are important, but if we want to keep them we need to stop allow 'retail parks' to be This need is reinforced by the needs for (to reduce carbon omissions) for more shopping trips to be by walking, cycling, and public transport. This means we need less big shops with massive car parks outside, and more small shops (e.g. in high streets) which people can walk to or cycle to.
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS14583
Person ID	1270702
Full Name	TESCO PENSION INVESTMENT FUND MANAG
Organisation Details	C/O Savills
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p>Jarman Square forms part of a wider 'Out of Centre Retail Location' as defined by draft Policy DM21 of the Emerging Strategy for Growth Local Plan.</p> <p>TPIFM notes and supports the principle of this designation which seeks to recognise that the Site and wider Jarman Square area performs a role within the retail and leisure hierarchy. That is that it complements the offering found within designated retail centres and ensures that Dacorum has a comprehensive offer to meet the requirements of its immediate and wider catcher area population.</p> <p>Notwithstanding this, it is noted that the retail and leisure sector has experienced a material change in recent years which has been further accelerated by the current pandemic. A number of further changes to the overall function of these sectors is projected in the short and longer term given the different market forces and change in consumer trends. It is anticipated that demand for retail and leisure floorspace within the Borough, including at Jarman Square, will change (either in terms of overall demand, type of premises or size of requirements).</p>

TPIFM advocates that the policy framework in the emerging Local Plan recognises the potential for the repurposing of existing commercial sites as opportunities for intensification and diversification. The introduction of a mix of uses, including residential, could support redevelopment as well as helping to support retained commercial floorspace. New residential communities will drive footfall and demand for retail, leisure and other commercial and community uses.

Jarman Square represents a previously developed site in a sustainable location and as such it has potential to accommodate a successful mix of land uses including residential. This could be in the form of re-use of existing floorspace, redevelopment of existing floorspace or simply as standalone development (building above the existing structure or building on underused parts of the Site).

The re-positioning of the existing scheme would enable the Site to contribute positively towards strategic objectives of the Plan in terms of residential land supply. Optimising the use of brownfield land will help to reduce pressure on Greenbelt and other non-developed sites within the Borough.

Included files

Title Retailing and Other Town Centre Uses

ID EGS14852

Person ID 1270808

Full Name Westmorland Limited

Organisation Details Westmorland Ltd

Agent ID 1270759

Agent Name Miss
Hanna
Mawson

Agent Organisation

Yes / No
* Yes
* No

Retailing and other town centre uses comment This draft policy sets out that proposals for main town centre uses outside the centres listed in Policy SP6 and not in accordance with other policies in this Plan should follow a sequential It should be clarified that 'other policies in this Plan' includes allocations outside of the centres which may be expected to include main town centre uses.

Included files

Title	Retailing and Other Town Centre Uses
ID	EGS14953
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	
Retailing and other town centre uses comment	<p>Retailing and other Town Centre uses</p> <p>Policy DM21 sets out policy in line with NPPF guidance. Criterion 6 of this policy sets out exceptions to this policy, which allow for additional retail development at existing out-of-centre retail locations (set out within Table 23). This part of the policy needs rewording to remove the first 4 words: <i>'in the following locations'</i>.</p> <p>Given that this policy will cover development over the plan period, it is also considered that reference should be made within Table 23 to the proposed allocation at Growth Area Tr01, with the caveat that it will only be permitted if Tr06 proves unable to deliver an additional supermarket to serve identified need within This would be consistent with the Further Dacorum Retail Study (2020).</p>
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS15102
Person ID	1270925
Full Name	Mrs Kathryn Salway
Organisation Details	Extinction Rebellion Dacorum
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Retailing and other town centre uses comment	<p>Retailing and Other Town Centre Uses</p> <p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:</p> <ul style="list-style-type: none"> the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility; the proposal would not result in the loss of a service or facility of value to the local community; and <ul style="list-style-type: none"> community ownership should be preferred to change of use/redevelopment and/or
Included files	
Title	Retailing and Other Town Centre Uses
ID	EGS15289
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Retailing and other town centre uses comment	<p><u>Chapter 16 : Retailing and Other Town Centre Uses</u></p> <ul style="list-style-type: none"> <u>Policy DM19 : Mix of Uses in Town, District and Local Centres</u> : The policy is acceptable in principle, but (1) should recognise that new Local and District Centres will be created in the Hemel North Growth Area.
Included files	

17 Climate Change and Sustainability responses

Title	Climate Change and Sustainability
ID	EGS51
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>With regards to reducing carbon emissions from council activities is there any plan to introduce electric powered vehicles into the Councils fleet such as the refuse carts and vans.</p> <p>Does this section also have any plan to install solar panels on any new planned industrial building at retro fit any existing ones.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS107
Person ID	1254846
Full Name	James Martin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	There is no evidence how the increase in homes will reduce vehicular emissions or improve air quality. There is already significant congestion in central berkhamsted and this will reduce the quality of air on the high street and at key junctions such as New Road in Northchurch which already cannot cope with the traffic quantity.
Included files	
Title	Climate Change and Sustainability
ID	EGS178
Person ID	1257687
Full Name	Elizabeth Cullen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Nicely written, but let's be honest - modern house builders will build as cheaply as possible to maximise profits. The 'not technically or economically practicable' card will be drawn at every turn. You have little agency in implementing this - would be great if you did. The Waste Hierarchy is old news - check out the Circular Economy.
Included files	
Title	Climate Change and Sustainability
ID	EGS259
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I support the Authorities approach to mitigating climate change.
Included files	
Title	Climate Change and Sustainability
ID	EGS276
Person ID	1258944
Full Name	Colin Sturges
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Policy SP10: This: " encouraging on-site renewable and low carbon energy sources on development sites, and stand-alone renewable energy or low carbon schemes;", should be " requiring... ". 2030 and 2050 aren't dates before which we do as little as we can get away with.
Included files	
Title	Climate Change and Sustainability
ID	EGS323
Person ID	1259852
Full Name	Imogen Wagstaff
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Carbon emissions need to be reduced from now, many of these proposals around housing far from central amenities will increase carbon emissions and will provide a barrier to net zero by 2030. New developments must be net zero from now onwards, not from 2030, all of the developments must be build in a sustainable manner with net zero emissions, 2030 is too late. It is a necessity that all developers are held to account and are net zero in their carbon emissions in the building of any new housing. I am concerned that some of the development proposals are on woodland sites. It is well known that woodland is a protective factor in the prevention of flooding, therefore it is not compatible with a climate change and sustainability policy to be felling any trees to build new housing. All proposals must be assessed first and foremost on their environmental impact. Large amounts of land (at least 20% of new developments) must be given back as natural habitats through rewilding.
Included files	
Title	Climate Change and Sustainability
ID	EGS343
Person ID	1253654
Full Name	Jodie Bell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	It is ridiculous to say that increasing the size on Tring by 50% will be sustainable. By building on green belt we will be destroying significant countryside and trees which as we all know are vital in fighting climate change. Green belt is also important habitat for local wildlife which are being driven from their homes more and more. There is a development being proposed to go alongside the canal in Tring; to propose that this is environmentally sound is a joke. The building works will cause HUGE disturbance to animals, chemicals from cement and building materials and eventually from the finished

houses themselves (eg: washing machines, drains, etc) will make their way into the canal, irrevocably damaging local wildlife. How you can say that this is climate change friendly and sustainable is frankly ridiculous.

The developments will also bring more traffic, lorries etc. The development of the supermarket being proposed in Tring is utterly stupid. The town is TINY. it's already difficult to get down the high street as it is, adding a superstore will cause a massive amount of congestion therefore adding significantly to pollution and therefore making this development unsustainable and definitely not environmentally friendly.

Included files

Title Climate Change and Sustainability

ID EGS348

Person ID 1258939

Full Name Ed Shedd

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment 17.7-17.10: In relation to the Hemel Garden Communities, we assume that these communities would exceed the demands of the climate change and sustainability policy. For example, all houses conforming to passivhaus standards?

17.9: We agree with the intent. However, nowhere in the documents does there appear to be the proactivity demanded. A clear example of this being the very specific mention of very specific road programmes in the plan, but no specifics as to how e.g. Hemel Garden Communities might meet the criteria for a Garden Community, beyond some nebulous statements.

In short, we would contend that much more work needs to be done on the local plan to incorporate the good intentions of Policy SP10 - Climate Change Mitigation and Adaptation

Included files

Title Climate Change and Sustainability

ID EGS356

Person ID 1259924

Full Name	Bassil Aslam
Organisation Details	
Agent ID	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Support is given to Policies SP10, DM22, DM23, and DM26, with reference to the proposed new Housing development being put forward for consideration by the Council in Flamstead ie. Land lying to the West of Chequers Hill.
Included files	
Title	Climate Change and Sustainability
ID	EGS374
Person ID	1260058
Full Name	Redbourn Parish Council
Organisation Details	
Agent ID	1260042
Agent Name	David Mitchell
Agent Organisation	Redbourn Parish Council
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	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.
Included files	

Title	Climate Change and Sustainability
ID	EGS401
Person ID	1257378
Full Name	Jackie Jones
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I would like to see Dacorum being clear that developers will be required to install green energy and that this must be in keeping with the general characteristics of the area. For instance, mandatory solar panels on all new build properties, community ground-source heat pumps. Dacorum has the opportunity to reflect the wishes of its current and future populations - this is a plan which will take us through critical years of addressing climate change.
Included files	
Title	Climate Change and Sustainability
ID	EGS409
Person ID	1260241
Full Name	BASSIL ASLAM
Organisation Details	
Agent ID	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Support is given to Policies SP10, DM22, DM23, and DM26, with reference to the proposed new Housing development being put forward for consideration by the Council in Flamstead ie. Land to the East of Chequers Hill.

Included files	
Title	Climate Change and Sustainability
ID	EGS425
Person ID	1260386
Full Name	DR Michael Wagner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Energy</p> <p>he Plan does not provide an energy strategy for the region which is critical for meeting 2050 net zero. The Plan must be developed to show at a minimum how the future development and growth is carbon neutral. This must include a requirement that any new development meets strict energy and carbon targets. As mentioned previously, new housing should meet much stricter passive house standards with PV/solar thermal, heat pumps etc, and these standards should apply to commercial and retail developments as well.</p> <p>Figure 6 does show some potential areas for the development of wind generation, but this needs to be developed into a strategy – identifying the capacity of wind power and the areas where development could be appropriate.</p> <p>Figure 6 also highlights potential areas for district heating. District heating will only make sense if there is a reliable local source of renewable energy that could be utilised. An energy strategy should look at the volumes of renewable energy available from the local area (eg arboriculture arisings, food waste etc) and the best use of these – which might be to fuel district heating where appropriate.</p> <p>The development of a Local Area Energy Plan should also be considered, which would address some of broader issues of making the areas carbon neutral.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS426

Person ID	1260386
Full Name	DR Michael Wagner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Resources</p> <p>It is good to see that there are some commitments to reduce resource use and the carbon intensity associated with building and the embedded carbon within buildings. However, as noted previously the plan could be significantly more ambitious, the policies associated with zero carbon homes which were to be introduced in 2016 could be applied now.</p> <p>Although the Plan does discuss some of the issues around flooding and SUDs, I did not see direct mention of reducing the water use for developments. New developments should be building in rain water harvesting and grey water recycling to reduce water use going forward.</p> <p>It would also be good to have a clear plan on wider resource use and recycling that should inform new developments. Ensuring that there is appropriate waste management in new developments, with space for storage and collection will be key to reducing waste and maximising recycling.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS437
Person ID	1260485
Full Name	Nick Bowles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Climate Change and Sustainability comment	<p>17.3 You cheerfully state that: <i>local planning authorities should adopt proactive strategies to mitigate and adapt to climate change</i></p> <p>17.9 <i>Plans should be proactive in mitigating and adapting to climate taking into account a number of impacts including flood risk, water supply, biodiversity and landscapes</i></p> <p>There is absolutely nothing in this document that states how these proactive strategies will be enacted and improvements achieved, aside from comments like you will be "encouraging on-site renewable and low carbon energy sources". Shouldn't that read legislating to ensure.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS493
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS509
Person ID	1260803
Full Name	Rollo Prendergast
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	See attached 1. Planned Growth and Supporting Infrastructure (item 6. Environmental Concerns - Water supply and treatment)
Included files	1. Planned Growth and Supporting Infrastructure.docx (1)
Title	Climate Change and Sustainability
ID	EGS547
Person ID	772477
Full Name	Mr. Roy Warren
Organisation Details	Planning Manager Sport England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Sport England would advise that in addition to the measures listed in section 3 of Policy SP10, the policies of the Local Plan can contribute to net zero carbon by designing developments to encourage physical activity. Sport England's new strategy (2021) "Uniting the Movement" sets out under the Active Environments theme on pages 32-34 that the sport and leisure sector has a contribution to make to tackling climate change by influencing how people live and travel, and through the sustainable planning and design of the nation's sport and leisure facilities. In addition to the measures listed in Policy SP10, the Local Plan can encourage physical activity in new development, which in turn reduces the need to travel by less sustainable transport modes. This is exemplified in particular through the Local Plan's (and the associated Dacorum Design Guidance) design principles set out in policy SP13 especially the Active and Healthy principle. To ensure that this is recognised, it is therefor requested that an additional measure is added to section 3 along the following lines:

3 j. designing development to encourage physical activity thereby reducing the need to travel by less sustainable travel modes

Included files [2021 Sport England - Uniting the Movement.pdf](#)

Title Climate Change and Sustainability

ID EGS570

Person ID 1261023

Full Name Richard Brash

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No
* Yes
* No

Yes

Climate Change and Sustainability comment

I believe that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan.

Dacorum Borough Council declared a climate emergency more than a year ago. Despite this and some well-intentioned promises, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various UK bodies on how carbon reduction plans have to be integral to the development of local plans.

Words of 'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act.

A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.

Included files

Title Climate Change and Sustainability

ID EGS604

Person ID 1261122

Full Name Mark Slade

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS631
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	<p>Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.</p> <p>My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.</p> <p>The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.</p>

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 Climate Change and Sustainability

ID EGS675

Person ID 1261232

Full Name Mark Burrage

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Policy DM23 should include a specific requirement for major developments to achieve a net zero target with perhaps 35% over Part L via onsite commitments and the remainder via offsite commitments.</p> <p>An additional policy should be introduced for all major developments. This should make it mandatory that a "Environmental Management Plan" covering design, construction and operation of the development be produced at the start of the design process. The plan should be publicly accessible via a website (and conventional methods) and actively promoted through public events and online presence. The EMP should include a register of environmental aspects the associated risks and opportunities mitigations and progress in implementation of mitigation. The EMP must be actively maintained throughout the design, construction and operation of the development. The EMP must be maintained at the expense of the developer by a suitably qualified consultant appointed by the Council.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS688
Person ID	1249904
Full Name	Mrs Christine Ridley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Aspirations concerning contributing to net zero carbon dwellings are very welcome, but since we are currently in a climate emergency, surely these should be achieved in a much shorter time scale than planned.</p> <p>For example, I fully support the following statement:</p>

17.1 *'The declaration also places key responsibilities on the Local Plan to include all available measures to cut carbon emissions and reduce the impact on the environment'*

and the statement: *'The NPPF expands on this duty, stating that: "local planning authorities should adopt proactive strategies to mitigate and adapt to climate change (paragraph 149) (in line with the objectives and provisions of the Climate Change Act 2008).'*

17.13 Policy SP10 - Climate Change Mitigation and Adaptation

the draft plan states:

'up until 2030, all new development will be required to accord with Policy DM23 - Energy and Carbon Emissions Reductions in New Development; and from 2030 onwards, all new development will be net zero'.

Surely **all** building which is being constructed at present and in the future should be adhering to code 6 or above, to make them as environmentally friendly as possible as soon as possible. The technology already exists to make houses net zero, so we shouldn't be waiting until 2030 to build net zero houses.

In any case, HM Government are currently bringing forward proposals that will require all new builds to be **carbon neutral by 2025**. Quote "The government has set out its plans and timeframe for its new Future Homes Standard which aims to 'radically improve' the energy performance of new homes, making them 'zero carbon ready' by 2025" (Architects Journal 20th January 2021) This renders the New Local plan **already out of date**.

The climate emergency is here now– not something which might occur in the future and as DBC has declared a state of emergency, this should be reflected in **immediate action**.

Proposal 5 states: *'Proposals should be designed to enable retrofitting to meet higher energy efficiency standards in future such as heat pumps or other low or zero carbon sources'*

But heat pumps exist now, so why wait and retrofit, which will be more expensive in the long run? Just fit them from the start.

These schemes seem very interesting:

17.37 *We consider that networks of district heating and Combined Heat and Power (CHP) should be pursued in District Heating Opportunity Areas (DHOAs) where significant regeneration is targeted, and in the Growth Areas. Systems could be powered by local biomass and appropriate waste that is not being recycled for other purposes. Major developments in DHOAs and on allocated Growth Areas will be expected to investigate the potential for providing site-wide community heat or energy networks or for connecting to existing networks of heat or power where this is available.*

17.38 *Smaller developments in or close to existing or planned networks of district heating or CHP should also investigate the delivery of suitable technologies to enable connection to those networks either now or in the future.*

A firm commitment to such schemes would be welcome.

17.43 The concept of **Carbon offsetting** is worrying as it allows carbon production with a clear conscience. It can be argued that any 'offsetting' actions e.g. planting hedgerows, or trees etc. should be carried out anyway.

Perhaps developers shouldn't be allowed to go ahead if they cannot meet the county's carbon reduction aspirations, rather than being let off the hook with what would amount to a fine.

Included files

Title Climate Change and Sustainability

ID EGS714

Person ID 1261251

Full Name Lesley Ashden

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment Building houses in known to increase rainfall run off and contribute to flooding, and we have seen serious flooding to roads this winter and with global warming we are predicted to have warmer, wetter winters. On the other hand, water extarction to provide wate rsupplis to all these houses will have an adverse effect on the water cisterns from which water is drawn fort he area. This will pose a proble for humans and the ecology of the rare Chiltern chalk streams and their flora and fauna. It will need careful planning to avoid huge damage

Included files

Title Climate Change and Sustainability

ID EGS739

Person ID 1261250

Full Name	Christina Thompson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS749
Person ID	211245
Full Name	Ms Jody Conibear
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Dacorum today has some beautiful examples of sustainable environmental work and conservation but this is being trampled on in the proposed plan. The number of new homes proposed for Tring on current farmland and greenbelt is astronomical and completely at odds with the intentions to preserve our precious areas of outstanding natural beauty.</p> <p>I cannot see how the number of proposed homes in this council area is sustainable in any way. We have seen all of the "commitments" that were promised for HS2 and now local residents, charities and other NGOs are exposing the blatant damage and deprioritisation of conservation and environmental considerations by the construction contractors and HS2 itself. I fully expect the same will happen with this plan. We are ruining this country for future generations.</p>
Included files	

Title	Climate Change and Sustainability
ID	EGS792
Person ID	1260046
Full Name	Jude Jackson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	the only way we will reduce the impact on the environment and climate change is by investing in our natural environment. Our local rivers and streams will be affected by the increased demand for water, local wild areas will be decimated by increased footfall. Increase in noise pollution from extra traffic will affect our birds, insects and mammals. building in itself destroys mature trees and wild areas which are essential for our natural flora and fauna
Included files	

Title	Climate Change and Sustainability
ID	EGS826
Person ID	1260562
Full Name	DAVID WILDE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate change and sustainability. I would like to see the following:

- developers selected based on their enthusiasm for and experience in construction of low-carbon buildings, not only on commercial considerations.
- highest possible low-carbon energy supply for new buildings, including micro-generation on every new building (solar PV, solar hot water, air-source heat pumps and/or ground source heat pumps)
- all new buildings to be insulated well in excess of Building Regs requirements.
- use of low embodied carbon materials in construction.
- an active programme of reto-fitting high spec insulation to existing homes.
- a mandatory proportion of carbon neutral passivhauses on every development.
- a more efficient and specific waste separation, collection and recycling system, with incentives and facilities for people to recycle carefully.
- shops selected on the basis of their avoidance of using single-use plastic and unnecessary packaging.
- all developments to be obliged to consider community generation of green electricity. For example on roofs of public buildings/schools etc.

Included files

Title Climate Change and Sustainability

ID EGS906

Person ID 926372

Full Name Mr Michael Nidd

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment The draft fails to recognise the climate emergency declared by DBC or to take any account of the consequences of removing 850 hectares of Green Belt, green-field and urban green space to make room for housing. Based on work done by University of London in respect of Hampstead Heath (320 hectares, capturing 150 tons per year), the draft Local Plan would lose carbon capture capacity equivalent to around 400 tons annually. There is no pathway to reduced atmospheric carbon: quite the reverse; in this draft plan.

Included files	
Title	Climate Change and Sustainability
ID	EGS921
Person ID	1261539
Full Name	Kirsty McCallan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Firstly,</p> <p>I am terrified.</p> <p>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>

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.

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.

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.

Financial aid to support the small businesses and mental wellbeing lost due to covid instead of building over priced unnessary homes?

Included files

Title Climate Change and Sustainability

ID EGS970

Person ID 1261569

Full Name Karen Mellor

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment

Resource use needs to be completely circular and regenerative by design.

Existing mature trees need to be retained at all costs (it has been proven that small saplings do not have the sequestration capabilities of mature trees - small trees take 20-50 years before they have the same sequestration as mature ones)

Trees should be planted along and around new development - both for provision of shade and sequestration. This should be a mix of native broadleaf and food generating, including BOTH sexes.

What is the point of 'future proofing' designs (eg heat pumps) when we know that within 10 years they will have to be retro-fitted. Its essential to install these at build - this would also mean you don't have to supply gas to the properties.

I don't see any comments covering urban heat islands.

Likewise, although the waste hierarchy covers anaerobic digestion (eg human sewage waste), I don't see anything in you proposals that expand on this. Or do you view this as someone elses problem? If so where is the joined up thinking?

Where is the link to the Hertfordshire's Building Futures Sustainable Design Toolkit?

You should make it a requirement that all development meet the Passivhaus standard, to the point that houses with solar PV and battery technologies are net generators for at least 6 months of the year.

Locally decentralized electricity should be central to the proposed developments.

Building should not be built on areas that are likely to flood. If anything these areas should be left to become marsh lands, these are superior in carbon sequestration.

Consideration needs to take account of possible sinkholes - particularly due to dryer summers.

On Figure 6 "Opportunities for Renewable Energy" I'm rather sceptical of this diagram as it implies wind turbines - in the bottom of a valley?

Meanwhile, solar PV and solar hot-water should be possible across the entire region.

Very unhappy with statement 17.43: Carbon offsetting is greenwash. If they can't comply they shouldn't be built.

17.44: S106 are a joke. This is basically a get out clause - if the land can't be found to plant those trees (because you've built on all the greenbelt) once the S106 expires the money goes back to the builder.

17.45: Being that 20 years takes us to 2041 - I believe that gas boilers will not be sold after 2030 it makes sense for all new builds to have heat pumps. Or community heating systems.

Where is the link to "Dacorum Climate Change and Sustainability SPD"?

Policy DM26 - Carbon Offsetting: This is greenwash!

Included files

Title Climate Change and Sustainability

ID EGS1003

Person ID 1261648

Full Name Colin Cartwright

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>My concerns re the Local Plan to 2038 mostly revolve around issues related to the environment. I recognise that the Plan does indeed address many issues related to Climate Change and Biodiversity at some length. However, my concerns have not been fully addressed. Here's why:</p> <p>The introductory video already demonstrates some of the 'double-think' going on at the most strategic levels of planning. It mentions the four airports in close proximity to Hemel, enabling international travel. However, in the absence of the airline industry having come up with viable sustainable alternatives to jet fuel, any attempt to combat Climate Change has to be honest about the need to drastically reduce rather than encourage international travel by jet. So, one of the key foundation stones for the Local Plan, mentioned in its own promo video, immediately undermines any real commitment to mitigating CO2, other emissions. This plan does not combat Climate Change and should not pretend that it will do so.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS1127
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Encourage safe cycleways between villages and the main hubs to reduce the reliance on motor vehicles. This is particularly important for secondary school children living in villages who have to rely on their parents to take them to/from school in cars. In addition, consideration must be given to increasing the number of school buses provided to alleviate this pressure.
Included files	
Title	Climate Change and Sustainability

ID	EGS1148
Person ID	1261804
Full Name	Mr Edward Parkes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	3. Failure to address climate emergency issues. Can the council explain how this development would reduce our carbon footprint and address our climate emergency as flagged by the Dacourm council?
Included files	
Title	Climate Change and Sustainability
ID	EGS1241
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Section 17 – specifically 17.1, 17.12 and 17.13 (Pages 99,100)</p> <ul style="list-style-type: none"> It is not clear how the Climate Change Strategy and Action Plan relates to the Hertfordshire Climate Change and Sustainability Partnership or Sustainable Hertfordshire Strategy. <p>Policy SP10 ‘Climate Change Mitigation and Adaptation’ part 3d and 3e (Page 100)</p>

- “encouraging on-site renewable and low carbon energy sources on development sites, and stand-alone renewable energy or low carbon schemes”. Given the increasing importance of mitigating action of all sorts, what does ‘encouraging’ mean in this context? How could this be made a mandatory/planning condition instead? In the point below ‘requiring development to have high levels of thermal efficiency, including setting carbon emission targets where applicable’ the word ‘requiring’ implies something stronger.

Section 17.36 ‘Low Carbon Community Heat and Energy Networks’ (Page 106)

- This is a valuable part of the Local Plan in terms of energy generation; however, the content is somewhat out of date.
- The ‘zoning’ is a good start, but only covers 2 technologies and dates back to 2010 (technology has changed a lot).
- We would like to see this exercise fundamentally updated to include (realistic) wind turbine locations, rooftop solar (PV, thermal) potential (which is for both newbuild and retrofit) and possibly additional ground-mounted solar.

Sections 17.41/42 ‘Stand-alone Renewable or Low Carbon Energy’ (Page 108)

- Comments as for point above.

Policy DM 25 ‘Stand-alone Renewable or Low Carbon Energy’ (Page 108)

- These points are by no means new, and the renewables sector has a wealth of experience regarding sensitive project development and implementation for wind/solar etc.
- We welcome the mention of community energy projects – this could be a significant driver for employment, for example if community-funded/owned projects were given priority within planning decision-making. In these projects the benefit to the community is 100% clear.

Included files

Title Climate Change and Sustainability

ID EGS1279

Person ID 1145427

Full Name Mr David Glenister

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>At the time of responding the River Bulbourne is dry and Tring reservoirs are at the lowest level residents can remember. These feed the canal system and we are at the highest point between London and Birmingham. In addition water flow in the River Gade is very low. Both the Gade and Bulbourne are chalk streams which are protected under the Water Framework Directive – and its translation into British Law. Any increase in housing in the current situation will lead to a further lowering of the aquifer and the Bulbourne never returning and the Gade drying up.</p> <p>With flood and drought on the increase with Climate Change, Berkhamsted could be at great risk of not coping with the severe lack of water this will be compounded with the new development especially in South Berkhamsted.</p> <p>Building on green belt land will interfere with the natural ecosystem. Bird and animals will not be able to feed on insects and grubs that will be on the green belt arable farm land. We need plants to provide oxygen in to the atmosphere to balance off the increase CO2 with the increase human population and associated activities. Humans must be in touch with nature and concreting land for housing is a detriment way forward.</p> <p>The increase in vehicle will be too great for the country town of Berkhamsted. There is already severe congestion and almost grid lock on the central junction of Kings Road/ Lower Kings Road with the High Street at peak times. The development of South Berkhamsted is 3 km from the station therefore people will use vehicles further adding to the traffic problem.</p> <p>Concreting over the land will prevent natural absorption of water into the ground. Absorbance of water into the earth helps to prevent flooding issues. This is especially important for Berkhamsted that is primarily a steep sided valley where water run off is critical .</p> <p>Animals and Birds will not be able to feed on grubs and worms that are present on the arable farm land and will be forced to migrate away from the centre of the town. This is not a balanced ecosystem.</p> <p>CPRE Herts state</p> <p>“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). 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</p>

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.

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. 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.’” Nowhere in this Plan is there any detail how this vital infrastructure will be delivered.

In conclusion;

Water supply and sewerage capacity as fundamental part of sustainability. For them not ot be considered in the Local Plan is of grave concern and should be corrected. This must be planned as a priority well before housing numbers are calculated.

Proceeding with a plan with such excessive growth numbers in the belief that developers will fully fund the infrastructure and assuming utility providers will simply deliver under their statutory obligations, would be disastrous for the Borough.

Included files

Title Climate Change and Sustainability

ID EGS1300

Person ID 1261957

Full Name Jeremy Johnson

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	I agree with 17.9 plans should be mitigate flood risk, water supply biodiversity and landscapes. But the large areas of housing development that you have identified will increase run off. When you are considering the housing itself and the flood risk you also need to consider the downstream impacts of increased rate of run off.
Included files	
Title	Climate Change and Sustainability
ID	EGS1319
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	SP10, DM22, DM23 I support policies. DM25 I is important to protect the Chilterns AONB. DM26 Carbon offsetting should not be treated as an easy way out. Solutions should be encouraged that use technology to provide micro generation and be carbon negative.
Included files	
Title	Climate Change and Sustainability
ID	EGS1334

Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS1384
Person ID	1254217
Full Name	Jamie Gray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate Emergency These plans do not fulfil the requirements to deal with the climate emergency in all future plans as defined by the government.
Included files	
Title	Climate Change and Sustainability

ID	EGS1444
Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Sustainability and environmental protection should be at the absolute core of the proposed future developments in the Local Plan, as recommended by national planning guidance. 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS1454
Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan
Included files	

Title	Climate Change and Sustainability
ID	EGS1504
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS1525
Person ID	1253872
Full Name	Georgia Huelamo
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The proposed plan does not detail a pathway to local carbon reduction which is a requirement of the National Planning Policy Framework, and the 2004 Planning and Compulsory Purchase Act. Facts: - Increase in construction waste and increase in emissions from construction traffic pollution.

- Decrease in greenbelt land, increase in the felling of mature trees and woodland, destruction of wildlife habitats and wildlife corridors leading to an increase in greenhouse gas emissions and the destruction of rare species and their habitats.
- damage to rare and precious chalk aquifers due to construction and land fill and an increased use of water for waste etc. flood risks due to tree felling.
- landscapes destroyed. biodiversity compromised to extinction.
- energy use in homes leading to increased carbon emissions.

The proposed plan is neither sustainable nor in line with climate change policy.

Included files

Title Climate Change and Sustainability

ID EGS1561

Person ID 1261809

Full Name Pam Ferguson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment The plan has poor climate change and sustainability credentials. This is supported by the council for the protection of rural England .

Included files

Title Climate Change and Sustainability

ID EGS1621

Person ID 1262282

Full Name Lisa Rowe

Organisation Details

Agent ID 1262276

Agent Name	Giulia Bunting
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Policies SP10, DM22, DM 23 Climate Change Mitigation and Adaptation The cumulative requirements set out in the policies relating to climate change mitigation and adaptation together with the associated DM policies are complicated, potentially onerous and duplicated between the policies. The policies do not therefore provide clear guidance to applicants on the specific requirements to deal with climate change and mitigation. There is concern that the requirements could impact on viability and these overall requirements need to be fully justified in the context of the viability assessment of the Plan.</p> <p>Policy DM 24 Low Carbon Community Heat and Energy Networks In the glossary to the Plan "major" development is defined as any development of more than 10 homes. The requirement for a site wide community heat or energy network or connection to an existing decentralised network for all major development proposals in defined Growth Areas is considered to be overly onerous and despite the provisions in the policy to consider alternative heating mechanisms there is concern that this require could impact the delivery of development.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS1643
Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	

Included files	
Title	Climate Change and Sustainability
ID	EGS1736
Person ID	1153984
Full Name	Elizabeth Rennie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Section 17 Climate change and sustainability. Climate change is a fact and the Environmental Agency predicts periods of drought during summer months . The building of such a huge number of new houses will place an enormous strain on the local aquafer without the provision of new water resources as mentioned in Section10. There is no reference to the requirement of such developments prior to the building of all these new houses, hence the plan is unsustainable.
Included files	
Title	Climate Change and Sustainability
ID	EGS1756
Person ID	1262366
Full Name	Isabel Frankel
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.
Included files	
Title	Climate Change and Sustainability
ID	EGS1783
Person ID	1154047
Full Name	Brendon Sparks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<ul style="list-style-type: none"> There appears very little concern with Climate Change and sustainability as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS1814
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS1837
Person ID	488516
Full Name	mr hugh siegle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I do not see how building homes on extensive areas of Green Belt surrounding Berkhamsted and Tring can possibly contribute to combatting climate change. Their "green lungs" and bio diverse areas must be retained. The investment and innovation required to meet Climate Change targets, such as sustainable transport and district heating are best delivered around Hemel Hempstead.
Included files	
Title	Climate Change and Sustainability
ID	EGS1919
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Climate Change and Sustainability comment	See comments on section 4 above
Included files	
Title	Climate Change and Sustainability
ID	EGS1939
Person ID	1262244
Full Name	Estelle Wraight
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Berkhamsted town centre and Northchurch have terrible air pollution already. How creating more unnecessary housings is going to reduce this pollution, when everyone will need to drive to facilities such as football, medical centres and supermarkets and more people driving to the station everyday???
Included files	
Title	Climate Change and Sustainability
ID	EGS1983
Person ID	1262618
Full Name	Jasmine Jenkins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Climate Change and Sustainability comment	<p>The policiesd all sound excellent but my worry is how wil lthey be enforced? Will planning be truned down if the plans are not acceptable?</p> <p>Whens it says the will have to offset carbon emissions of they cannot be mitigated what does this a ctually mean How wil lthey do this??</p> <p>These things are very important but I would imagine it makes the houses more expensive I have a feeling that there wil lbe get out clauses! I hope the new builds will be as sustainable and efficient in energy as is possible</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS2007
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Climate Change and Sustainability comment	<p>17.3 The whole life impact of developments must be considered. Notional carbon offset elsewhere counts for nothing if the new housing prevents threatened wildlife from migrating to save itself from extinction. This includes the impact on irreplaceable, rare natural ecosystems, such as chalk streams.</p> <p>Care must also be taken not to discourage sustainable activities such as walking by forcing pedestrians to share footpaths with wheeled traffic.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS2019
Person ID	1262601

Full Name	Anne Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>A Climate Change Strategy should be in place and available for comment in relation to the Dacorum Local Plan. It is unhelpful for it to follow. Intention means little. There must be effective monitoring processes so that developers have to comply.</p> <p>With its valley location, Berkhamsted has its unique challenges in discharging greenhouse gases into the atmosphere.</p> <p>The potential of 120 more cars on New Road, Northchurch puts the children at St Mary's for example at a much higher risk from the side effects of pollution.</p> <p>The local plan does not address how it will ensure that the aquifer and three chalk streams in Dacorum are protected</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS2059
Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	

Title	Climate Change and Sustainability
ID	EGS2112
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate change and sustainability. Too much development based on an out dated development matrix. More houses will mean more cars (especially if you build small houses as they will have more families in them over an area) which brings more car emissions, more light pollution, more household waste, more sewage (system already overwhelmed particularly in Northchurch some of whoms residents cannot currently use toilets due to back up is that fair on them) more water run off which is current soaked up by the farmland, woods and green belt which will run down the hill into the town overwhelming the main road through the town. This plan has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS2150
Person ID	399537
Full Name	Mr David Featherstone
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	<p><u>Discussion</u>: 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Several local authorities in England (e.g., Greater Cambridge, Reading and Liverpool City) have developed integrated local plans that take account of climate change, biodiversity, well-being and social inclusion. There is no evidence in the proposed local plan of such an approach.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS2152
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Frankly you show no evidence, anymore than the government, as to how this will be achieved. You will require a lot more money and resources to have any chance and I can see nothing in this section other than well worn phrases. In addition,

how will a hugely increased population lead to the achievement of your objective. There will be more emissions from housing, more emissions from transport of any kind and not much to reduce them going forward. Old cars will be with us for long time yet, indeed the governments policy will lead to older cars on the road as most people will no be able to afford to change to electric: this is despite my own cynicism about the impacts of electric carts themselves re battery manufacture and disposal and the increased electricity output that we will require to run them. Furthermore, I would like to fully understand your proposals for coverting the existing bus services to fully electric. Where is the money coming from for this? Please do NOT say that this is none of your business. Finally, what is your proposal to fully insulate and acquire lower emission heating in the housing stock we already have.

Included files

Title Climate Change and Sustainability

ID EGS2199

Person ID 1262765

Full Name Paul Rees

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment An inconvenient truth is that relentless growth and the construction of new homes drives climate change and is unsustainable. That is why, as I have said in my previous comments, the number of new homes assumed in the current strategy must be halved, journeys must be moved away from roads and onto cycle paths, and villages, such as Kings Langley, must be far better protected.

Included files

Title Climate Change and Sustainability

ID EGS2204

Person ID 1262841

Full Name Nada Ryan

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	As far as I can see this has very little climate change and sustainability credentials as was highlighted by CPRE Herts who have published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS2224
Person ID	1262860
Full Name	Susanne Rees
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Given the worldwide drive to cut carbon emissions, the envisaged number of new homes in the Dacorum plan should be halved and the transportation priority should be to drive human journeys away from roads and instead encourage people to make their journeys on foot or by bike.
Included files	
Title	Climate Change and Sustainability
ID	EGS2268
Person ID	1262925
Full Name	Nandipha Jordan
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions. All construction must be carbon neutral from development to finished build.
Included files	
Title	Climate Change and Sustainability
ID	EGS2294
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	DBC should be applauded for declaring a climate emergency and BRAG supports many of the sentiments in this section, including the specific point 3.i “ <i>supporting retrofitting schemes to the existing building stock to meet higher energy efficiency standards.</i> ”, but SP10 doesn’t go far enough with regard to new developments. At the very least all developments on Green Belt should be net carbon neutral with immediate effect. It is not enough for DBC to call a climate emergency and then develop a housing growth plan that locates developments in remote unsustainable locations that will by definition work against the worthy aims of the Climate Emergency initiative.

As outlined elsewhere, BRAG does not accept that Green Belt release is required or that exceptional circumstances exist to change the current Green Belt boundaries, but if there are releases developments need to be carbon neutral regardless of when they are brought forward.

In 2017 existing residential buildings produced 58% of the Borough's greenhouse gas emissions. While it might sound facetious, reducing the amount of new development will naturally reduce the effects on climate change, so it is imperative that DBC are not allowed to plough ahead under the illusion that the numbers set out in the plan are required. This will protect the environment more than any Climate Change and Sustainability policy can, however well written they may be.

It is also true that a single large-scale development or new town in one area offers the opportunity for infrastructure investment such as district heating, renewable energy and carbon neutral transport modes etc. that smaller developments cannot. BRAG accepts that the Garden Communities of north Hemel, HH01 and HH02 has that scale.

In contrast, the proposals for South Berkhamsted and the other ridge-top Green Belt sites on the southern perimeter of the town will remove bio-diversity, and introduce non porous surfaces and pollution to a densely populated, high traffic area. In short, these sites can only contribute to the catastrophic effects of climate change, regardless of policy statements.

The Green Belt land between Berkhamsted and the A41 had previously been designated as an important 'Green Lung' for the town. That designation has clearly been dropped completely. In truth, if DBC had wanted to be bold and display a real commitment to the 'Climate Emergency' the plan could have highlighted how the health of those 'Green Lungs' could be improved by potentially using the land to expand historic woodland along with other bio-diversity improvements, rather than losing productive land in the chase for 'targets' that don't exist – inevitably facilitating the further clogging of the towns arteries and adding to the Climate Change problems.

BRAG is grateful to CPRE Herts for publishing its initial reactions to the Plan. BRAG agrees entirely with CPRE's assessment on this subject, viz

"The proposed local plan fails to demonstrate a pathway to local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF), and the 2004 Planning and Compulsory Purchase Act. An evidence-based carbon reduction plan is also required to meet the national climate obligations of net zero by 2050.

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.”

As part of BRAG’s response to the 2017 ‘Issues and Options Consultation’ the following points were made:

- Water and sewerage – Proposals are not environmentally sustainable in particular in respect of water. The demands of new residential development in this respect are contrary to the ‘Vision’ for the Borough
- The environmental consultants make reference to there being a problem with water supply, but do not state that what is proposed is unsustainable. At the time of responding the River Bulbourne is dry and Tring reservoirs are at the lowest level residents can remember. These feed the canal system and we are at the highest point between London and Birmingham. In addition water flow in the River Gade is very low. Both the Gade and Bulbourne are chalk streams which are protected under the Water Framework Directive – and its translation into British Law. Any increase in housing in the current situation will lead to a further lowering of the aquifer and the Bulbourne never returning and the Gade drying up. Dacorum has just spent millions of pounds improving the Water Gardens in Hemel Hempstead which are dependent on the Gade for their water supply.
- It has been suggested by consultants that water can be brought to Berkhamsted providing mains capacity is increased but this would appear to depend on there being sufficient aquifer capacity in the River Colne catchment area, which there is not, and water being imported from East Anglia. The Anglian Water region is under severe stress and was in supply deficit in 2015. Surplus water for other regions is unlikely.
- Hence any build in Dacorum before major infrastructure water systems have been put in place will result in significant damage to our environment locally and are unsustainable. The Region requires a water ring system that will move water from the NW of England to the South. Rather than accepting that it is up to third party utility suppliers to meet demand, Dacorum should be robustly arguing that until that sustainable water is available, no significant building of new houses should occur.

DBC's reply was a stunning "developers have a right to connect and development cannot normally be resisted on the grounds of inadequate water supply or sewerage capacity." If DBC do not regard water supply and sewerage capacity as fundamental part of sustainability, then the Borough is in trouble.

Indeed, BRAG would query whether the Borough is correct in their assertion. 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.

During a very wet winter reservoirs are now full, but we all know that this is a temporary situation and the flood/drought cycle caused by climate change will only exacerbate the problems and BRAG understands that Affinity Water is committed to reducing abstraction year on year to the tune of 12% by 2025, while DBC are planning massive growth in demand. It really doesn't stack up.

Again, BRAG thanks CPRE Herts for doing more work on this subject:

"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).

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.*

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.’”

Nowhere in this Plan is there any detail how this vital infrastructure will be delivered. Proceeding with a plan with such excessive growth numbers in the belief that developers will fully fund the infrastructure and assuming utility providers will simply deliver under their statutory obligations, would be reckless.

Included files

Title Climate Change and Sustainability

ID EGS2336

Person ID 1261830

Full Name alistair budd

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Climate Change and Sustainability comment With plans that envisage major intrusions into the greenbelt which is currently largely farmland there is great opportunity which the current site plans does not grasp . Which is the substantial increase in creating of diverse habitats . By major woodland native broadleaf planting to create better residential environments with a much more natural feel .
 Using nature to filter the pollution from traffic with substantial roadside tree and wild area planting to separate busy roads from homes . Milton keynes has done a very good job on this .

Included files

Title	Climate Change and Sustainability
ID	EGS2382
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	

Title	Climate Change and Sustainability
ID	EGS2389
Person ID	1254107
Full Name	Polly Eaton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Point 17 states “We declared a Climate Emergency in July 2019”, however this section then points to “collecting contributions towards a carbon off-set fund... increasing the area of habitats that fix and store carbon, including tree planting”. This is NOT a solution. Furthermore the document states:</p> <p>“17.19 Proposals should be designed to enable future retrofitting to meet higher energy efficiency standards and lower GHG emissions by connecting to a air source heat pump, community heat networks or other low or zero carbon sources.”</p>

This is a total waste of money and resources! We have the technology, and we must build carbon neutral homes not waste money retro fitting in 10 years time - shifting the cost (financial and resource) onto the home owner. The proposal is short sighted and in no way acknowledges the climate emergency which has been accepted locally and nationally. It is outrageous that any new building (home or commercial) is fitted with fossil fuel reliance. ANY new home should be built with excellent insulation and sustainable heating systems (air or ground source heat pumps).

Included files

Title Climate Change and Sustainability

ID EGS2418

Person ID 1227518

Full Name Mr John LOWRIE

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Climate Change and Sustainability comment There is no mention of how water will be provided to the new Hemel Garden Community

Included files

Title Climate Change and Sustainability

ID EGS2444

Person ID 1262981

Full Name Chris Mabley

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Climate Change and Sustainability comment	Properly evidenced bases for assessment are required to make any of these proposals real for delivery. For example: Bio diversity audit, Detailed mapping of woodland, hedges etc especially trees and spinneys including those on public spaces like the Golf course and those in private areas like the railway banks or road side, Precise mapping of water courses including temporary ones like the Bourne Gutter, chalk stream sources, aquifers and water catchment patterns. Planning needs to have powers to enforce building standards that protect against climate change, the 2008 provisions should be upgraded to reflect the declaration of climate emergency or this plan is totally inadequate. If other policies are in preparation this plan should remain in draft form so that the newer requirements can be assessed.
Included files	
Title	Climate Change and Sustainability
ID	EGS2556
Person ID	1263183
Full Name	Claire Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Climate Change and Sustainability comment	Doesn't this plan provide a chance to make some really bold local choices in terms of sustainability, what a missed opportunity.
Included files	
Title	Climate Change and Sustainability
ID	EGS2562
Person ID	221857
Full Name	Mr George Bull
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	POLICY SP10 As the UK has now pledged to cut CO2 emissions by 68% by 2030, based on 1990 levels, measures to actively cut emissions must be placed front, middle and end of any development plan. While Policy SP10 is clear, it is substantially disregarded in the site-specific requirements which make no more than passing reference to climate-change considerations. I cannot escape the impression that SP10 exists to greenwash planning proposals which are inconsistent with settled legislation and the government's ongoing commitments.
Included files	
Title	Climate Change and Sustainability
ID	EGS2578
Person ID	1262037
Full Name	Jason Silver
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Limited coverage of climate and sustainability issues, more critical thought needs to be given to these two issues
Included files	
Title	Climate Change and Sustainability
ID	EGS2602

Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Policy DM22 states that new development will be expected to contribute to climate change mitigation including “Incorporate green infrastructure to sequest carbon, to include two or more new trees (a tree shall be considered to count if it ordinarily reaches a mature height of 6 metres or more) per dwelling or per 100 sq m floor space (for non-residential developments) on-site.” (3c)</p> <p>In general we support both the principle of this policy and the fact that it is measurable. However, if the target of two new trees is correct the policy should be for a <u>net</u> two or more new trees, i.e. a domestic dwelling that results in the loss of one tree should require the planting of at least three new trees? We would like to understand how this figure has been calculated and what objective it supports? For example, in terms of carbon sequesting, will this offset the loss of Green Belt land (noting that this isn’t one of the purposes of the Green Belt)?</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS2766
Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Climate Change and Sustainability comment	DM22 - Does not identify the options for demolition/reuse/recycling of housing / buidling materials. Fig 6 - Opportunities for Renewable Energy - This is completely ridiculous, outrageous and unacceptable. There must be some sort of buffer between Ashridge and natural areas and wind turbines. This is completely irresponsible. This figure must be redrawn.
Included files	
Title	Climate Change and Sustainability
ID	EGS2774
Person ID	1262722
Full Name	Colin McCready
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I cannot see how increasing the number of dwellings by the proposed rates will have anything but a significant detrimental effect on the Climate and removing open land (which has proved so invaluable for people's mental health over the last 3 lockdowns).
Included files	
Title	Climate Change and Sustainability
ID	EGS2796
Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>SP10c Add including tree planting and retention of hedgerows, woody verges and copses to conserve and improve biodiversity</p> <p>Add include charging points for electric vehicles for each new dwelling where possible to support reduction of Carbon Dioxide emissions</p> <p>Add: Adapting to surface water flood risk by adding permanent balancing ponds / pools and ditches in strategic locations and raising ground floor height of homes vulnerable to periodic flooding to reduce flood risk.</p> <p>DM22 3c Add Retain existing established green infrastructure <i>such as mature rural hedges</i> and incorporate additional green infrastructure to sequest carbon,...."</p> <p>DM22 4c. Add: Deliver an overall net-biodiversity gain and positive measures <i>to retain</i> and support wildlife including specialist habitat users that goes beyond planting trees.</p> <p>DM23: Retention of arable farmland or conversion to arable farmland is a mitigation measure that should be included, reducing emissions from transport of food imports. Converting from bovine livestock farming to arable farming reduces methane and Co2 production from cows significantly.</p> <p>DM24 & Map 6 Wind turbines are considered by many to be an eyesore and should not be erected in Areas of Outstanding Natural Beauty or within view of AONB. This commitment should be stated in the policy.</p> <p>DM25 (f) Wind turbines should not be sited on migratory or high density flight routes for birds or flight paths for bats as their lungs are unable to withstand the drop in pressure if they fly in close proximity to the blades. Therefore many of the green sites listed in figure 6 will be unsuitable. A full survey should be carried out by bat and bird experts at appropriate times of the year to assess the impact of any proposed wind turbine locations.</p> <p>Some South facing slopes in Dacorum may be suitable for small scale unobtrusive solar panel farms.</p> <p>Natural carbon capture materials such as wood and compressed straw could be encouraged in housebuilding (eg as part of a wall with an outer brick layer).</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS2842
Person ID	1263198
Full Name	Jillian Hipson
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	17.1 The proposed Local Plan involves the destruction of 850 hectares of Green Belt Land. This is a huge impact on the environment. The calculation of housing numbers needed is too high. More attention should be paid to using brownfield sites in towns, where there is already good transport links, rather than Green Belt land, which cannot be replaced. Building outside towns means that everyone living there will have to drive if they want to go anywhere. This is not good for climate change strategies.
Included files	
Title	Climate Change and Sustainability
ID	EGS2863
Person ID	1012318
Full Name	Mrs Jane Hennell
Organisation Details	Area Planner Canal and River Trust
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The Canal & River Trust would wish to discuss matters relating to the use of canal with the council prior to the provision of the sustainability SPD. Dacorum contains several possible locations within the more urban areas and whose residences & businesses could use the Low & Zero Carbon (LZC) thermal energy from our canals. This may also be possible within some of the proposed site allocations. DM 33. footnote 21 should remove mention of canals. The Canal & River Trust do not require a 10m set back as a matter of course, and often require development to address the canal and be built closer than 10m to improve place making.

Included files	
Title	Climate Change and Sustainability
ID	EGS2878
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 * Yes * No	Yes
Climate Change and Sustainability comment	<p>Policy DM22 states that new development will be expected to contribute to climate change mitigation including “Incorporate green infrastructure to sequest carbon, to include two or more new trees (a tree shall be considered to count if it ordinarily reaches a mature height of 6 metres or more) per dwelling or per 100 sq m floor space (for non-residential developments) on-site.” (3c)</p> <p>In general we support both the principle of this policy and the fact that it is measurable. However if the target of two new trees is correct the policy should be for a <u>net</u> two or more new trees, i.e. a domestic dwelling that results in the loss of one tree should require the planting of at least three new trees? We would like to understand how this figure has been calculated and what objective it supports? For example, in terms of carbon sequesting, will this offset the loss of Green Belt land (noting that this isn’t one of the purposes of the Green Belt)?</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS2930
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS2950
Person ID	1263445
Full Name	Andrew Farrow
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Focusing building on the outskirts of the main towns means that the developments are some distance from existing transport infrastructure. The Plan states that “the local and strategic road network [has] sufficient capacity providing there 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 .</p> <p>The Plan goes on to say that “we are continuing to develop the transport proposals”, but the development area allocated to the north of Hemel doesn’t have any existing transport infrastructure and the Plan doesn’t set out what would be put in place. Without a credible plan for sustainable transport, <u>it is likely that the development will result in several thousand more cars on local roads.</u></p>
Included files	
Title	Climate Change and Sustainability
ID	EGS3044
Person ID	1261425

Full Name	Camilla Pascucci
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>1 The Dacorum DLP completely fails to address our Climate Emergency.</p> <p>If this plan is implemented, these damaging proposals would result in the loss of a massive 850 hectares of the Green Belt. It is clear that within this DLP Dacorum are declaring a mission to provide 100% of their self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity, causing significant harm to the Green Belt and AONB.</p> <p>Policies in a Local Plan should concentrate on building in urban areas away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value.</p> <p>Where I live in Northchurch, we have Ancient Woodlands and rural hedges which need to be protected. These form Wildlife Corridors and are tracts of land with continuous or close-by pockets of natural or semi-natural habitat.</p> <p>It also jeopardises plans, currently in early stages of discussion, to potentially extend the AONB or upgrade its status to that of a National Park.</p> <p>The Government is still working on the planning reforms proposed in the recent White Paper 2020: Planning for the Future and the outcomes of the Public Consultation on that policy. This is particularly relevant to calculation of housing needs, location of these and protection of Green Belt and AONB. Why not wait for this paper to be finished?</p> <p>1 The Dacorum DLP should use an integrated approach that puts climate change, biodiversity and well-being and social inclusion at the centre of their</p> <p>DBC declared a Climate Emergency over a year ago. This proposed DLP clearly prioritises economic growth and greenfield land development above the Climate Emergency!</p> <p>The Dacorum DLP needs to include minimum housing specifications for developers, which takes into account carbon reduction/neutral plans such as minimum insulation requirements, rainwater harvesting, solar power, electric car charging points, ground source heat pumps and air source heat pumps for each new house proposed to be built. This would have a positive impact on the environment instead of a negative.</p>

Currently the plan just uses the word 'encouragement' which is completely insufficient for the point we have reached in the Climate Emergency.

This is a requirement of the NPPF and the 2004 Planning and Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050. This should be underpinning a revised land use and development strategy.

Included files

Title Climate Change and Sustainability

ID EGS3050

Person ID 1146084

Full Name Mr Jason Parr

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

Included files

Title Climate Change and Sustainability

ID EGS3051

Person ID 1146084

Full Name Mr Jason Parr

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes	
* No	
Climate Change and Sustainability comment	<p>Environment</p> <p>The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council.</p> <p>Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS3101
Person ID	1263510
Full Name	CAROL HAYES
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Climate Change and Sustainability comment	<p>Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS3227
Person ID	1263566
Full Name	Frances Read

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS3261
Person ID	1145069
Full Name	LYNN WALLIS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are central to their new planning policy. The proposed plan does not meet these obligations.
Included files	
Title	Climate Change and Sustainability
ID	EGS3273
Person ID	1262255

Full Name	AJ W
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Great that DBC have declared a climate emergency but the building in Berkhamsted goes against the principles as the development cannot be sustainable given the locations and pressure that it will put on our natural resources (water) and the impact of increased use of carbon transport (as the locations are too distant from the town centre). The principals behind carbon neutral developments as outlined are sound, however given the scale of the developments in Berkhamsted these cannot be achieved. The details outlined have little credibility when held up against the CPRE Herts published concerns. The areas by the A41 in Berkhamsted had previously been designated as an area of 'green lungs' for Berkhamsted, this designation has been dropped and there is nothing that will replace this land, this exacerbating rather than dismissing the impact on climate change. So much for declaring a climate emergency. Do not remove green belt land for targets that are not reasonable or necessary.
Included files	
Title	Climate Change and Sustainability
ID	EGS3353
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	

Included files	
Title	Climate Change and Sustainability
ID	EGS3365
Person ID	1263693
Full Name	Ruth Colderwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS3380
Person ID	1261609
Full Name	DEBORAH CROOKS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	

Title	Climate Change and Sustainability
ID	EGS3422
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	No Comment
Included files	

Title	Climate Change and Sustainability
ID	EGS3435
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I refer to the concerns highlighted by the CPRE Herts Nowhere in this Plan is there any detail how this vital infrastructure will be delivered. Proceeding with a plan with such excessive growth numbers in the belief that developers will fully fund the infrastructure and assuming utility providers will simply deliver under their statutory obligations, would be reckless.

Included files	
Title	Climate Change and Sustainability
ID	EGS3511
Person ID	1263810
Full Name	David Tolfree
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS3548
Person ID	1263821
Full Name	Anne Isherwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	
Included files	

Title	Climate Change and Sustainability
ID	EGS3562
Person ID	1263797
Full Name	Chloe Collins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Dacorum declared a Climate Emergency in July 2019 and have committed to reducing carbon emissions across Council activities to net zero by 2030. The declaration also places key responsibilities on the Local Plan to include all available measures to cut carbon emissions and reduce the impact on the environment.</p> <p>The Plan goes on to say that the impacts of growth will be reduced through: the prudent use of natural resources; encouraging renewable energy production; the effective recycling of waste; the sustainable design of new development and careful land management.</p> <p>Tring Rural PC would strongly advocate and support a Service Level Agreement between Dacorum Borough Council and Buckinghamshire Council agreeing a cross-boundary partnership to allow residents of the parish to utilize the facilities of the Household Recycling Centre at Aston Clinton, a distance from the Parish boundary of approximately 1 mile.</p> <p>This would concur with and support the following;</p> <ul style="list-style-type: none"> • Hertfordshire Waste Management Development Framework 2011 – 2026 • Dacorum Sustainable Waste Development • Dacorum Recycling Carbon Footprint • Dacorum Cross Boundary Working

Currently residents of the parish use the nearest Borough Household Waste and Recycling Centre in Berkhamsted, a round journey in excess of 20 miles.

To achieve this, we would draw attention to **Buckinghamshire Council Household Recycling Centre's Waste (HRC's) Access and Acceptance Policy (WAAP)** 1st August 2020 detailing permitted users of their sites and clarifies access for Non-Buckinghamshire households.

- The WAAP identifies by map, a 7-mile radius catchment area (which includes Tring Rural Parish)
- Policy A5 recognises that in most cases residents will use HRCs that are closest to their household, hence there will be some cross-border use of HRCs.
- Policy A5.2 affirms that the Council may set up Service Level Agreements (SLA) with neighbouring authorities for cross-border access to ensure the costs of provision of the HRC are shared fairly.

Included files

Title Climate Change and Sustainability

ID EGS3585

Person ID 1145631

Full Name Mr Alastair Greene

Organisation Details Clerk
Little Gaddesden Parish Council

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Climate Change and Sustainability comment

Included files	
Title	Climate Change and Sustainability
ID	EGS3608
Person ID	1263865
Full Name	Robin McMorran
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	More weasel-worded greenwash. Tackling climate change by building more roads. Are you people for real?
Included files	
Title	Climate Change and Sustainability
ID	EGS3616
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair Dacorum Environmental Forum Waste Group
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<i>"Policy DM22 5. Sustainability statements will be assessed on their merits but with</i>

an expectation that all measures should be satisfactorily met unless there is clear and convincing evidence as to why any measure(s) cannot be implemented, and if so, that alternative sustainability measures should be proposed.”

In parts 1 to 4, Biodiversity is frequently referred to in various contexts, including mitigating biodiversity loss, encouraging net biodiversity gain by developers, etc., but there is not enough emphasis on these policies being mandatory rather than aspirational, or any specification of the grounds on which the policies could be circumvented, implying that it will be up to planning officers to be swayed by representations from developers.

For our full response see:

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

The link below if you are viewing this online

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

Included files	
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Title	Climate Change and Sustainability
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ID	EGS3625
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Person ID	222269
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Full Name	Georgina Tregoning
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Organisation Details	
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Agent ID	
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Agent Name	
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Agent Organisation	
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Yes / No	
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* Yes	
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* No	
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Climate Change and Sustainability comment	
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Included files	
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Title	Climate Change and Sustainability
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ID	EGS3649
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Person ID	1207786
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Full Name	Anne Foster
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Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Issues to address the Climate emergency are welcomed, but there seems to be a complete contradiction between encouraging build and buildings to low carbon standards whilst at the same time proposing large developments on sites which encourage car use because of their location in relation to local facilities and employment.</p> <p><i>The policies of the Plan will contribute to net zero carbon through mitigation measures by:</i></p> <p><i>prioritising the development of previously developed land in sustainable locations;</i></p> <p>o This is not evidenced by the proposals for Berkhamsted with developments at some distance from the town's facilities, at the top of the steep valley sides where car journeys are the only feasible mode of transport for most. No safe cycle ways (though only the fittest could use them) from the sites and no viable public transport</p> <p>o Massive development in unsustainable locations, with no additional local employment provision just adds to out-commuting, and with car journeys essential to access local facilities, contributes to the Climate crisis.</p> <p><i>where carbon emissions cannot be mitigated, collecting contributions towards a carbon off-set fund.</i></p> <p>o How will this be identified/ defined. Is this in addition to S106 and CIL contributions?</p> <p><i>increasing the area of habitats that fix and store carbon, including tree planting;</i></p> <p>o Tree planting is welcomed. Perhaps this proposal could be strengthened in line with the Planning for the Future white Paper for every street to be tree lined.</p> <p><i>encouraging on-site renewable and low carbon energy sources on development sites, and stand-alone renewable energy or low carbon schemes;</i></p> <p>o I welcome the proposals for District Heating provision, however there is no detail or evidence as to how this would be provided. Where will the incinerators/ Biomass boilers etc be located and how and with what will they be fed ? How good would it be to have district heating for the whole town – if Copenhagen can do it</p> <p>o The viability get out for developers means this is unlikely to happen unless it is mandated.</p> <p><i>designing buildings to reduce excessive cooling and heating loads through orientation, landscaping and appropriate glazing;</i></p> <p>o There is no evidence of this even being considered in the current Bearroc developments in Berkhamsted. In the "jam in as many as you can get" policy of most developers, I'm not sure orientation would be a prime consideration, or an enforceable condition.</p>

o Glazing – all buildings now include double glazing, are we looking at something other than that? If so it needs to be mandated.

encouraging the use of sustainable transport modes in all new development;

o Not applicable (as discussed) to most sites in Betkhamsted

supporting retrofitting schemes to the existing building stock to meet higher energy efficiency standards.

o Welcome proposal

The policies will ensure that new developments are resilient and contribute to climate change adaptation by:

o adapting to climate change by ensuring development avoids areas of flood risk and reduces the risk of flooding elsewhere, through the use of measures including sustainable urban drainage systems, green roofs and walls, and permeable surfaces.

o BK09 is in a flood zone with a rare chalk stream habitat running through the site. ?

(Though I note the existing Madelyns site in Berkhamsted, where the Bulbourn runs through the middle of the site and an area of tree lined open space surrounding the Bulbourn has been maintained for residents' enjoyment.)

Included files	
Title	Climate Change and Sustainability
ID	EGS3715
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	Destroying the green belt is not good for the climate or environment
Included files	
Title	Climate Change and Sustainability

ID	EGS3728
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS3779
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The plan destroys the greenbelt which is vital to the environment and to 1000's of natural habitats. The plan contributes very negatively to 'the mitigation of climate change'. Please stop and rethink.
Included files	
Title	Climate Change and Sustainability
ID	EGS3836

Person ID	1263924
Full Name	Susan Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Regeneration of existing town centres uses far less energy than New Build. It is irresponsible to build out of town estates that require people to travel by vehicle when thoughtful and forward thinking redevelopment would be more sustainable.
Included files	
Title	Climate Change and Sustainability
ID	EGS3862
Person ID	1263989
Full Name	Lauren Ashton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS3872

Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	How is building more housing helping the climate, its making the air we breath worse from further traffic
Included files	
Title	Climate Change and Sustainability
ID	EGS3941
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I fail to see how any of this plan in any way tackles the climate emergency. Buidling on greenbelt alone acts in direct contradiction to that aim. The position of the houses is likely to increase traffic pollution as too far to walk to town and the housing itself is not sustainable. It has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability

ID	EGS3959
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>DBC declared a climate emergency a year ago. Despite this, the Strategy clearly prioritises economic growth & greenfield land development over concerns for the climate emergency. This strategy fails to take account of legislation and recommendations from various UK institutions on how carbon reduction plans have to be integral to development of local plans. A carbon reduction plan is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.</p> <p>Water supply in this area is constrained being supplied by the local aquifer which also feeds our Chalk Streams. The Environment Agency says that abstraction is to be restricted to 'current' levels. This poses a challenge to the Infrastructure Plan and is a critical aspect of the proposal to increase dwelling numbers by over 20% in this locality. New supplies of water for this area are not likely to be possible until after 2030.</p> <p>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This could take 10 years plus.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS3977
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS4089
Person ID	1264201
Full Name	Philip Hughes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	7.14 to 7.17 discuss reducing the climate change impact of constuction. Surely the best way to reduce this is to construct fewer houses? Even if the homes are low carbon, more homes equals more CO2 emissions from our borough. The best solution for the environment is to build less.
Included files	
Title	Climate Change and Sustainability
ID	EGS4106
Person ID	1264210
Full Name	Fiona Fulford
Organisation Details	myself
Agent ID	1264200

Agent Name	Fiona Fulford
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Given the current climate emergency in my view the whole plan should be geared around how the housing targets (reduced by half as mentioned before) can be met while minimising the impact on climate change and loss of biodiversity. This plan refers to many laudible aspirations - aiming to be carbon neutral by 2050 etc but there don't seem to be any hard targets to get us there. The 2030 target is less than 9 years away! If use of wood for building construction acts as a carbon sink then why is there not a specific proportion of the construction in wood required in the plan? Why is there not a target for a proportion of homes to be fitted with ground source heat pumps rather than just referring to allowing for retrofitting which pushes the onus and cost onto future owners and will subsequently never happen. Similarly specific minimal targets should be set for water conservation measures.</p> <p>Aside from the affordable housing, the houses in this area will go for a premium and the builders will recover the additional costs from 'bulk' fitting these sustainable options. In addition such measures act as a valuable selling point as owners will avoid future utility bills. Therefore rather than the plan merely requiring developers to submit a sustainability statement that may never be achieved in reality, specific minimum sustainability requirements should be laid down upfront as a requirement for developers and implementation monitored.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS4124
Person ID	1264070
Full Name	Michelle Carnegie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS4141
Person ID	1262892
Full Name	Jean Farrer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I refer you to the CPRE and Chiltern Society submissions which I support. I am glad that DBC has acknowledged there is a climate emergency. I fail to see how your plan takes this into account at all. The loss of up to 850 hectares of Green Belt, the density of housing and the consequent pollution and drain on natural resources makes this aim unachievable.
Included files	
Title	Climate Change and Sustainability
ID	EGS4150
Person ID	1264064
Full Name	Melanie Ingram
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Climate Change and Sustainability comment	<p>It is impressive that the plan carries the impact of climate change and Sustainability in a high profile manner, however the policy itself is at odds with the plan. Referencing point 17.9 the plans do not seem to take into any account supporting appropriate measures to ensure future resilience of communities by taking away important green spaces used agricultural (increasing our reliance out of the area and out of country products).</p> <p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS4175
Person ID	1145844
Full Name	Dr and Mrs Melvyn Else
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS4216
Person ID	1263248
Full Name	Johnjo McDermott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>This will all have a major impact on the environment - more unaffordable housing, meand more people will commute which will lead to more stress on the A41 and local roads which will lead to more pollution.</p> <p>Again lip serive paid to the environment!</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 (www.lichfield.uk).</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:

... there is no capacity for more footfall at the station, the car park gets full and the trains to London overcrowded (based on pre-covid numbers).

... the High Street is unsuitable, as the main throughfare from east to west Tring the High Street is narrow and overcrowded for both traffic and pedestrians at peak times. The structure of the High Street has subsided with the current levels of traffic, this will only get worse.

... under the current proposals Tring bears the brunt of new housing with more homes than other towns in Dacorum (percentage terms).

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

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

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

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

Sustainability

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

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

Summary

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

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Included files	
Title	Climate Change and Sustainability

ID	EGS4222
Person ID	1264269
Full Name	Paul de Hoest
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Numerous local groups have commented on this consultation including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party to name a few. I agree with the stance taken by all of these groups. The fact that all these (and there will be others) are providing the same substantive message from the local population to you should demonstrate that these proposals do not have the support of the people. I do not propose to add to your reading burden by rehashing all of their points but I do make the following observations.</p> <p>The opening lines of this section stress the importance of mitigation and offsetting. The document stresses that climate change is man made. It is man made because of overdevelopment. No amount of mitigation can offset the damage created by a 24% increase in the housing stock. This simply repeats the mistakes of the past. To the extent that the plan relies upon "offsets" such as the planting of trees or creation of habitats elsewhere these are NOT offsets. An offset is a by product reaction directly caused by the initial action. The damage and the mitigating offset are caused by the same thing. What is commonly called CO2 or biodiversity offsetting is no such thing - the so-called offset is an entirely separate action that could just as easily be carried out without the original action.</p> <p>We need more trees and habitats in any case irrespective of this house building programme. Please do these anyway. BUT trees and habitats take generations to grow and evolve to maturity - no amount of short term tree planting or manufactured habitat construction could replace what this house building programme would destroy during our lifetime. Environmental offsetting is completely delusional.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS4265
Person ID	1261915
Full Name	Eleanor Lovett

Organisation Details	Landhold Capital
Agent ID	1261754
Agent Name	Eleanor Lovett
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Landhold Capital supports the Council's aspirations with regards to climate change mitigation and adaptation. However, there is a requirement in the Framework at Paragraph 16 for policies to be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. This also could be interpreted as a requirement to ensure that developers are clear how to respond to policy requirements, and in the case of Policy DM22 and Policy DM26, reference is made to a requirement to accord with a Climate and Sustainability SPD that it appears has not yet been prepared. As such, it is considered that the policy should not require proposals to accord with something that does not yet exist, and it would be more appropriate to reference the SPD through the supporting text to these policies and avoid ambiguous references within the policies.</p> <p>In relation to Policy DM23 however, Landhold Capital is concerned that the policy does not establish whether the requirements in relation to residential development are required at outline or detailed application stage. It is not realistic for the Council to expect all outline planning applications for major residential development to be able to fulfil the requirements of this policy, as matters such as layout, orientation, and materials are yet to be decided and fixed at that stage. This policy should be modified to specify that these requirements are expected at the detailed consent stage, in order to accord with the provisions of Paragraph 35 of the Framework, and in particular to ensure that policies are positively prepared in a way that is aspirational but deliverable.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS4296
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Sustainability guidelines decree that consideration must be given to reuse or refurbishment of existing buildings before demolition. This means that much more consideration must be given to brownfield opportunities. These are likely to increase in the future, following a move away from High Street retail and any planning should be put on hold until these opportunities can be evaluated.
Included files	
Title	Climate Change and Sustainability
ID	EGS4306
Person ID	1264321
Full Name	David` Fox
Organisation Details	personal
Agent ID	1264318
Agent Name	David Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Given the current global climate emergency in my view the whole plan should be geared around how the housing targets (reduced by half as mentioned elsewhere) can be met while minimising the impact on climate change and loss of biodiversity. This plan refers to many laudable aspirations - aiming to be carbon neutral by 2050 etc. but there do not seem to be any hard targets within this plan to help get us there. The 2030 target is less than 9 years away and covers much of this development plan period (2020-2038)! For example, if use of wood for building construction acts as a carbon sink then why is there not a specific proportion of the construction in wood required in the plan? Why is there not a target for a minimum proportion of homes to be fitted with ground source heat pumps, rather than just referring to allowing for retrofitting (which pushes the onus and cost onto future owners and will subsequently never happen). Similarly, specific minimal targets should be set for water conservation measures.</p> <p>Aside from the affordable housing, the houses in this area will go for a premium because of the desirable location and therefore developers will easily recoup the additional costs from 'bulk' fitting these sustainable options. In addition, such measures act as a valuable selling point as owners will avoid future utility bills. Therefore, rather than the plan merely requiring developers to submit a sustainability statement that may never be delivered in reality, specific minimum</p>

sustainability requirements should be laid down upfront as a requirement for developers, then their actual implementation monitored.

Included files

Title Climate Change and Sustainability

ID EGS4325

Person ID 1261265

Full Name Richard Case

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

Insufficient action to contribute to reversing climate change

The Plan, despite good-intentioned words to the contrary, seems to prioritise economic development over sustainability and the environment. Too much development and too much of it on greenfield sites. In an area like this, construction standards need to reflect the highest feasible environmental standards for carbon reduction.

Included files

Title Climate Change and Sustainability

ID EGS4327

Person ID 1264325

Full Name Olivia Halper

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

Yes

* No	
Climate Change and Sustainability comment	SP10 needs to refer to active and sustainable travel as a key way to contribute to net zero carbon. DM22: Have you considered circular economy principles/guidance to refer to. https://www.london.gov.uk/sites/default/files/design_for_a_circular_economy_web.pdf
Included files	
Title	Climate Change and Sustainability
ID	EGS4350
Person ID	1264337
Full Name	Jane Taylor
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Section 17 Disinvestment in fossil fuels of all pensions and reinvest in sustainable energy as soon as possible.
Included files	
Title	Climate Change and Sustainability
ID	EGS4363
Person ID	1262873
Full Name	Donna Atkinson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>The plan should also guarantee the following: Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices. Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted. All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator. Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution. Control of polluted waters discharge to non-mains drainage prohibited. Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights. Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees. Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old). If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS4460
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	There is very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS4529
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>My family and I moved to Dacorum in 2018 to settle in Berkhamsted for at least the next 25 years. Over this time, we look forward to developing ever stronger links throughout the community and watching our young children grow to adulthood. As such, we have a vested interest in seeing the Borough grow in a way that works for all its citizens – both existing and new.</p> <p>Against this backdrop, I wish to formally state my strong objections to the ‘Dacorum Local Plan (2020-2038) Emerging Strategy for Growth’. The evidence suggests that, if this plan is approved, your personal legacy will be of considerably worsening towns and communities within the Borough. For new residents moving to the area and for those already here. For all ages. And for all financial situations. I suspect you don’t want to be remembered after you leave this office as the person who caused such damage to an area. So, I ask you to fundamentally rethink.</p> <p>Due to the COVID-19 constraints on travel and mingling for the past year, my experience, and hence prime objection, focuses on the portions of the Local Plan relating to developments in the Berkhamsted area.</p> <p>To summarise:</p> <ol style="list-style-type: none"> 1. Flawed modelling of number and type of housing required would fail to meet the actual needs of the voters moving into the area, whilst disrupting those already here far more than is needed.

2. Inadequate commitment to transport infrastructure needs to accommodate the changes proposed would result in a legacy of decades of traffic congestion for voters in Dacorum and visitors to the area.
3. Insufficient provision of water supply, wastewater disposal and other infrastructure would leave households with shortages and damage the local water table, with knock-on considerations around subsidence and environmental impact.
4. Unworkable assumptions around public transport and foot / bike journeys would see considerable increase to carbon emissions in the Borough and considerable travel delays around vital transport hotspots (town centres, schools, rail stations, etc.).
5. The above worsening of conditions for the new and existing voters in the area also comes with an ecological cost due to the loss of green belt. If green belt is to be repurposed, it must be done in a way that makes the greatest positive impact for the current and future residents of Berkhamsted. This plan wastes that sacrifice.

These are fundamental flaws in the strategy underpinning the 'Dacorum Local Plan (2020-2038) Emerging Strategy for Growth'. As such, this plan should be rejected outright, and a new plan drawn up that addresses the actual needs of the area for today and the long-term success of the Borough.

These points are expanded below.

Incorrect Assumptions for Housing Provision

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

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

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

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

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

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

Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision

on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt."

Failure to Provide Adequate Supportive Infrastructure

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

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

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

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

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

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

Impact on Green Belt and Other Designated Land

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

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

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

You are now faced with a personal choice.

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

Included files	
Title	Climate Change and Sustainability
ID	EGS4581
Person ID	1145918
Full Name	Mr Richard Tregoning
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS4636
Person ID	1264483
Full Name	Peter and Miriam Yarrien
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate Change and Sustainability: As stated in the Plan we have a Climate Emergency and DBC must grasp the opportunity with this Plans' final implementation, whatever form that may take, to strive to minimise environmental damage, in all its forms, during the construction and through the life of the building occupation. DBC should consider all

aspects including: emissions, energy efficiency both during build & occupation, use of sustainable material, use of renewable micro generation, protection of flora and fauna, etc., from build, through occupation to eventual demolition. Section 17.11 suggests that the Local Authority maybe given the authority to set energy efficiency standards. How is DBC intending to implement the Plan to achieve highest standards in these areas, commensurate with environmental considerations as well as cost of development and cost of ownership? Approaching the implementation of the Plan as “business as usual” and relying on Building Regulations alone will not be good enough for the best solution delivery and achieving a net carbon zero target. How is DBC intending to demonstrate carbon reduction targets in line with NPPF requirements and implement and monitor these budgets?

Included files

Title Climate Change and Sustainability

ID EGS4663

Person ID 1264477

Full Name Vivianne Child

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Climate Change and Sustainability comment

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

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

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

Included files

Title Climate Change and Sustainability

ID	EGS4668
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I support all efforts to prevent climate change but allowing 2,200 new homes in Berkhamsted and Northchurch and 2,700 in Tring whilst encroaching on the local countryside will not achieve this. These are small market towns and road traffic in the form of at least 2 cars per household will be very damaging. The idea that public transport will prevent this is a nonsense.
Included files	
Title	Climate Change and Sustainability
ID	EGS4682
Person ID	1264462
Full Name	Penny Clifton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The proposed strategy flies in the face of Dacorum BC's commitment to reducing carbon emissions to net zero by 2030.

The strategy talks about "prioritising the development of previously developed land in sustainable locations", yet this plan repeatedly includes the use of land in areas that are unsustainable or are in the green belt.

The dramatic increase in car use that will inevitably arise from proposed development will contribute to the poor air quality already experienced in some areas of the borough. The topography of Berkhamsted for example, means that pollution gets trapped in the valley bottom, and any increase in traffic will undoubtedly cause the problem to increase.

Included files

Title Climate Change and Sustainability

ID EGS4698

Person ID 1264495

Full Name Ian Fyfe

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

Energy.

The plan puts considerable emphasis on renewable energy and seeks to provide district heating and Combined Heat & Power where feasible, but also identifies huge tracts of land all across the Borough as being "opportunities for Wind Turbines". There is no mention of the use of solar panels.

Comment.

The idea of using wind turbines across Dacorum is unbelievable and seems to fly in the face of maintaining the attractive appearance of the area around Berkhamsted.

Included files

Title Climate Change and Sustainability

ID EGS4742

Person ID 1264510

Full Name	Martin Evening
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The Dacorum DLP completely fails to address our Climate Emergency.</p> <p>If this plan is implemented, these damaging proposals would result in the loss of a massive 850 hectares of the Green Belt. It is clear that within this DLP Dacorum are declaring a mission to provide 100% of their self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity, causing significant harm to the Green Belt and AONB.</p> <p>Policies in a Local Plan should concentrate on building in urban areas away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value.</p> <p>Where I live in Northchurch, we have Ancient Woodlands and rural hedges which need to be protected. These form Wildlife Corridors and are tracts of land with continuous or close-by pockets of natural or semi-natural habitat.</p> <p>It also jeopardises plans, currently in early stages of discussion, to potentially extend the AONB or upgrade its status to that of a National Park.</p> <p>The Government is still working on the planning reforms proposed in the recent White Paper 2020: Planning for the Future and the outcomes of the Public Consultation on that policy. This is particularly relevant to calculation of housing needs, location of these and protection of Green Belt and AONB. Why not wait for this paper to be finished?</p> <p>The Dacorum DLP should use an integrated approach that puts climate change, biodiversity and well-being and social inclusion at the centre of their plan.</p>

DBC declared a Climate Emergency over a year ago. This proposed DLP clearly prioritises economic growth and greenfield land development above the Climate Emergency!

The Dacorum DLP needs to include minimum housing specifications for developers, which takes into account carbon reduction/neutral plans such as minimum insulation requirements, rainwater harvesting, solar power, electric car charging points, ground source heat pumps and air source heat pumps for each new house proposed to be built. This would have a positive impact on the environment instead of a negative.

Currently the plan just uses the word 'encouragement' which is completely insufficient for the point we have reached in the Climate Emergency.

This is a requirement of the NPPF and the 2004 Planning and Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050. This should be underpinning a revised land use and development strategy.

Included files

Title Climate Change and Sustainability

ID EGS4804

Person ID 1264475

Full Name Simon Davies

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Climate Change and Sustainability comment

Included files

Title Climate Change and Sustainability

ID EGS4878

Person ID	1264524
Full Name	Karen Kang
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS4939
Person ID	1264521
Full Name	Max Hidalgo
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	how the borough can say we are aligning with the UK's climate change net zero goals while massively changing and building new unsustainable homes on green belt is the most controversial point of this whole process. Building to our netzero targets we must focus on regeneration of brown field sites and discouraging the use of transportation. The current plan only seems to encourage the use of the car and doesn't cover how local emissions including NOx levels will be reduced. The plan needs to be evolved to create a sustainable zero carbon travel hub to serve the surrounding areas. The current plan will increase local congestion, discourage other road users to use their bikes and or walk and also migrate back to cars.

Included files	
Title	Climate Change and Sustainability
ID	EGS4955
Person ID	1264547
Full Name	Sara Penn Williams
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Increasing housing to this extent is far from sustainable - extra housing means extra people, extra cars etc etc. All new housing and development needs to have sustainability at the forefront - solar panels as standard, renewable energy being used, water collection systems. Building on green belt can never be viewed as sustainable. People need their green spaces in order to thrive.
Included files	
Title	Climate Change and Sustainability
ID	EGS4974
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent ID	1264539
Agent Name	Bethan Fox
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	<p>Given the current global climate emergency in my view the whole plan should be geared around how the housing targets (reduced by half as mentioned elsewhere) can be met while minimising the impact on climate change and loss of biodiversity. This plan refers to many laudable aspirations - aiming to be carbon neutral by 2050 etc. but there do not seem to be any hard targets within this plan to help get us there. The 2030 target is less than 9 years away and covers much of this development plan period (2020-2038)! For example, if use of wood for building construction acts as a carbon sink then why is there not a specific proportion of the construction in wood required in the plan? Why is there not a target for a minimum proportion of homes to be fitted with ground source heat pumps, rather than just referring to allowing for retrofitting (which pushes the onus and cost onto future owners and will subsequently never happen). Similarly, specific minimal targets should be set for water conservation measures.</p> <p>Aside from the affordable housing, the houses in this area will go for a premium because of the desirable location and therefore developers will easily recoup the additional costs from 'bulk' fitting these sustainable options. In addition, such measures act as a valuable selling point as owners will avoid future utility bills. Therefore, rather than the plan merely requiring developers to submit a sustainability statement that may never be delivered in reality, specific minimum sustainability requirements should be laid down upfront as a requirement for developers, then their actual implementation monitored.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5032
Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Building a string of developments on hill top sites in Berkhamsted will have a negative effect on climate change and sustainability. This important "Green Lung" is apparently to be covered with non-porous surfaces with the resultant negative impact on bio-diversity. Carbon emission will inevitably increase with the anticipated c15400 car movements per day and congestion in the town centre will exacerbate the pollution problems.</p> <p>I support the CPRE's assessment on this subject, that "The proposed local plan fails to demonstrate a pathway to local carbon reductions" and endorse their reactions to the plan and their comment on the issues related to water supply.</p>

I draw attention to the submission made by BRAG in response to the 2017 'Issues and Options Consultation' on water and sewerage and support their comments in reponse to this consultation on the subject.

Included files

Title Climate Change and Sustainability

ID EGS5035

Person ID 1264557

Full Name Natalie Crane

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

Included files

Title Climate Change and Sustainability

ID EGS5060

Person ID 1264258

Full Name Fintan FitzPatrick

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions. All construction must be carbon neutral from development to finished build. Please see some examples already in the UK at https://goodhomes.org.uk/net-zero-map.</p> <p>I welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see my response to Environmental Sustainability in question 1.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5062
Person ID	1264555
Full Name	Rick Freedman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Climate Change and Sustainability comment	<p>There is a lot of agreeable policy included in the plan in regards to sustainability which should be commended. I fully support making the borough as sustainable as possible, as quickly as possible.</p> <p>I disagree with 17.15. I would much prefer to see developers tasks with achieving the most energy efficient, sustainable, and community beneficial buildings/surroundings that they possibly can, rather than restricting the sustainability targets to the process of construction itself. Why seek to retain outdated and inefficient technologies of the past if builds can be updated to higher environmental standards if they can stay in keeping with the charatcer of the area. The building process of each structure will be over in a matter of months, but the climate bill of people living in or using those structures will continue for the life of the building; better to have the usage costs as low as possible (below zero) for as long life as possible.(Thus accomodating 17.24-17.26)</p> <p>17.28 is little more than a get out clause that developers will abuse. But committing to a cash payment (which can take many years before residents see any benefit due to moving through multiple parties). A regimented enforcement of such standards should be required; failure should require developers to invest int he sustainability of other land they have banked in the borough to offset. They would then never be able to unlock this land until the standards on it's previous developments had been corrected.</p>

Finally, DBC should future proof this section of the plan to accomodate for novel technologies and ground-breaking improvements. Referring to acceptable standards of progressive national bodies (like The Energy Trust) should mean that as new technologies are accepted and adopted across the UK, that DBC can encourage / enforce developers to pursue these standards rather than the ones fixed in the plan document.

Included files

Title Climate Change and Sustainability

ID EGS5090

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

Climate Change and Sustainability comment I support all of these policies in principle but suspect there is very little likelihood of their meaningful implementation, or there scope to abnegate the damage caused by the development proposed. Housing on the Cala site in Tring is proceeding apace, with beautiful south-facing roofs and not a solar panel in sight.

Included files

Title Climate Change and Sustainability

ID EGS5091

Person ID 1264556

Full Name Craig Ridsdale

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The Dacorum Plan states in Section 17; Climate Change and Sustainability</p> <p><i>“17.1 Our climate is changing as a result of human activity and left unabated will have catastrophic effects on the way we live our lives. We declared a Climate Emergency in July 2019 to respond to these challenges and, through this, have committed to reducing carbon emissions across Council activities to net zero by 2030. The declaration also places key responsibilities on the Local Plan to include all available measures to cut carbon emissions and reduce the impact on the environment”</i></p> <p>We are all witnessing the dramatic and potentially irreversible changes to our climate as a result of us, the human race. This consultation document is littered with the usual platitudes of ‘carbon neutrality’, and ‘protecting the area for future generations’.</p> <p>How will building thousands and thousands of houses on green belt land do anything other than create further greenhouse gases and inevitably, cause further deleterious changes in the climate. Once green belt land is gone, it is gone forever, along with everything that once grew and thrived there. Invaluable natural habitats disappear overnight and along with them, perhaps the ONLY thing that could reverse the growth in greenhouse gases, namely trees, hedges and plants.</p> <p>I pick on only one part of the Dacorum Local Plan here. There are many other flaws in its content, and it carries too many assumptions about the future.</p> <p>Yes, we need places to live, but there are other ways to create them that could have significantly less impact than those described here.</p> <p>I strongly object to these proposals.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5116
Person ID	1264550
Full Name	Kevin Fielding
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS5126
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Climate Change and Sustainability</p> <p>"To help deliver the Borough's contribution towards the national targets it sets a phased approach leading to all new development to be net zero carbon from 2030 onwards. "</p> <p>How is this going to be achieved, when building over close on 2,000 acres of Green belt and Green field sites, which with grass, trees and hedgerows are already carbon absorbers? The Plan takes away a huge section of the Borough's carbon absorbing countryside.</p> <p>The emphasis on house building design and sustainability is to be applauded; hopefully all developers will have to deliver well designed, modern and efficient sustainable housing from now on.</p> <p>However, the increase (25%) predicted in the number of people alone with this growth, will in itself generate many more challenges on reaching the zero carbon goal by 2050, than if the number was lower.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5166
Person ID	1264509

Full Name	Hannah Fox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Given the current global climate emergency in my view the whole plan should be geared around how the housing targets (reduced by half as mentioned elsewhere) can be met while minimising the impact on climate change and loss of biodiversity. This plan refers to many laudable aspirations - aiming to be carbon neutral by 2050 etc. but there do not seem to be any hard targets within this plan to help get us there. The 2030 target is less than 9 years away and covers much of this development plan period (2020-2038)! For example, if use of wood for building construction acts as a carbon sink then why is there not a specific proportion of the construction in wood required in the plan? Why is there not a target for a minimum proportion of homes to be fitted with ground source heat pumps, rather than just referring to allowing for retrofitting (which pushes the onus and cost onto future owners and will subsequently never happen). Similarly, specific minimal targets should be set for water conservation measures.</p> <p>Aside from the affordable housing, the houses in this area will go for a premium because of the desirable location and therefore developers will easily recoup the additional costs from 'bulk' fitting these sustainable options. In addition, such measures act as a valuable selling point as owners will avoid future utility bills. Therefore, rather than the plan merely requiring developers to submit a sustainability statement that may never be delivered in reality, specific minimum sustainability requirements should be laid down upfront as a requirement for developers, then their actual implementation monitored.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5194
Person ID	1264593
Full Name	Rebecca Mackenzie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Climate Change and Sustainability comment	How does building on green belt deliver a low carbon, sustainable society? Please don't just pretend to believe in Climate Change, ACT as if you believe in Climate Change.
Included files	
Title	Climate Change and Sustainability
ID	EGS5221
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Climate Change and Sustainability comment	<p>Given the current global climate emergency in my view the whole plan should be geared around how the housing targets (reduced by half as mentioned elsewhere) can be met while minimising the impact on climate change and loss of biodiversity. This plan refers to many laudable aspirations - aiming to be carbon neutral by 2050 etc. but there do not seem to be any hard targets within this plan to help get us there. The 2030 target is less than 9 years away and covers much of this development plan period (2020-2038)! For example, if use of wood for building construction acts as a carbon sink then why is there not a specific proportion of the construction in wood required in the plan? Why is there not a target for a minimum proportion of homes to be fitted with ground source heat pumps, rather than just referring to allowing for retrofitting (which pushes the onus and cost onto future owners and will subsequently never happen). Similarly, specific minimal targets should be set for water conservation measures.</p> <p>Aside from the affordable housing, the houses in this area will go for a premium because of the desirable location and therefore developers will easily recoup the additional costs from 'bulk' fitting these sustainable options. In addition, such measures act as a valuable selling point as owners will avoid future utility bills. Therefore, rather than the plan merely requiring developers to submit a sustainability statement that may never be delivered in reality, specific minimum sustainability requirements should be laid down upfront as a requirement for developers, then their actual implementation monitored.</p>

Included files	
Title	Climate Change and Sustainability
ID	EGS5244
Person ID	1262647
Full Name	Carolyn Wallis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>It is important that the council ensure that all developers adopt these sustainable building standards and are monitored to ensure that they are adhered to and all houses are produced to the given standards - these will make developments more expensive, and the council must not relax standards to satisfy private developers.</p> <p>It is difficult to see how all these sustainability policies can be reconciled with taking Green Belt land for development and with extracting ever increasing amounts of water from our chalk streams.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5262
Person ID	1175740
Full Name	Berkhamsted Schools Group
Organisation Details	The Berkhamsted Schools Group
Agent ID	1175743
Agent Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No	

* Yes	
* No	
Climate Change and Sustainability comment	<p>Climate Change & sustainability</p> <p>This issue is a core value for the BSG. The BSG is part of the fabric of the town and they wish the development at Haslam Field to be a legacy achieving a high standard of design and with appropriate sustainability measures.</p> <p>The BSG will be assessing climate change, sustainability and the high quality design of future proposals for site BK03 with potential end delivery partners at the appropriate time</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5289
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Climate Change and Sustainability comment	Increasing the housing limits into the countryside and green belt will greatly increase the use of transport and do nothing to help the important need for climate change and sustainability.
Included files	
Title	Climate Change and Sustainability
ID	EGS5334
Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	There is very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS5367
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Is the use of so much greenbelt land the best way to provide accomodation ? has the reuse of existing sites been completely exhausted? the use of greenbelt land MUST be a LAST RESORT!
Included files	
Title	Climate Change and Sustainability
ID	EGS5377
Person ID	1264363
Full Name	Roselyn King
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS5440
Person ID	1264636
Full Name	Lynsey Bilsland
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The proposed housing will require owners to drive into Berkhamsted town (or out of town), contributing to traffic pollution and exacerbating climate change. Similarly removal of Greenbelt will destroy many trees and will remove land that will reduce risk of flooding (no soak up of water due to destruction of fields). These developments are not supported by improved transport or local school infrastructure or an employment strategy in Berkhamsted all of which will exacerbate climate change due to the need to drive, not to mention the use of concrete in building the developments, which in itself uses a huge volume of water.
Included files	
Title	Climate Change and Sustainability
ID	EGS5451
Person ID	1264628
Full Name	sophie boden
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>It is incredibly disrespectful that this section is so far down. You say that you have declared a climate emergency and that human activity is causing climate change, yet you are here advocating change and destruction of habitats, ecosystems, increasing pollution, and other measures that will destroy our environment.</p> <p>Instead of developing a local plan to build houses, why don't you put all these efforts into lobbying the government and changing the way people behave.</p> <p>Focus on making a big change. Focus on people reusing products, not having fast fashion (on everything, furniture, cars, toys etc.) Get people to think about their big decisions. Why do we need houses? The really hard discussion, this is about population growth; population growth requires education. The hard fact is, if we don't do something about it, then the world won't be able to support this population and we will end up at war about resources (I know that is a horrible situation, but if you are going to plan for this, why not actually plan for the future?)</p> <p>Mark Carney (ex head of Bank of England) has flagged that by 2050 climate change deaths will be like an annual covid crisis. Think smarter, invest smarter, lobby the government, say it is unacceptable to just build over all of England. If Dacorum makes a stand, other counties may too and we can enact some real change across the country. We can make a difference.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5458
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	I agree with all the proposals to make the houses energy efficient. There also needs to be safe walking and cycling routes to the train station and industrial sites included in any development.
Included files	
Title	Climate Change and Sustainability
ID	EGS5480
Person ID	1264647
Full Name	Richard Burnell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	This strategy is misaligned to it's intended targets. Redevelop brownfield sites and leave Greenfield out of the plan. Allow natural effects of climate to be accommodated in the rural environment.
Included files	
Title	Climate Change and Sustainability
ID	EGS5540
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS5547
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>17.1 The declaration of a climate emergency and commitment to reducing carbon emissions is at odds with the plan to build houses on a swathe of green belt land. This land should be preserved to help keep carbon emissions as low as possible.</p> <p>17.5 The commitment to new homes being net zero by 2038 is much too little, much too late. If Dacorum is serious in its commitment to addressing the climate emergency it must immediately require all new housing to be net zero and include a range of features such as solar panels and the highest standard of insulation.</p> <p>CPRE Herts has highlighted its concerns with which I agree.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5640
Person ID	1264689
Full Name	Philip Hobden
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Section has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS5655
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I do not agree that developing greenfield land in Berkhamsted and Tring is in any way consistent with this policy. Where is the evidence that this proposed development mitigates and adapts to climate change? Building houses that are not of a high environmental standard in their loss of heat and use of energy and water made from concrete which contributes to increased CO2 emissions will not help to meet net zero carbon emissions by 2050 they will contribute towards emissions. If Dacorum understands their legal duty set out in the 2008 Planning Act to ensure the plan contributes to the mitigation of and adaption to climate change they would not be proposing site 18 and other greenfield development.
Included files	
Title	Climate Change and Sustainability
ID	EGS5662
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS5697
Person ID	1264710
Full Name	Jess Malcolm
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	More thought needed regarding environmental impact for the wildlife that lives here. We have a vast variety of natural diversity here and we should not take that for granted. These animals need to be cared for and protected. If we are destroying their homes we must help them rebuild and protect our wildlife!!
Included files	
Title	Climate Change and Sustainability
ID	EGS5729
Person ID	1264678
Full Name	Tom A
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS5738
Person ID	1264473
Full Name	Jane Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Climate change is likely to make flooding worse in the Long Marston area where flooding is already a fact, not simply a risk.</p> <p>The impact of a 3400 housing development with approx 6000 cars + inevitable delivery services would bring a huge increase in emissions to local villages</p> <p>The development would have a significant impact on bioversity in the area - highlighted in the Strategic Housing Land Availability Assessment as "a fundamental constraint to development of this area"</p> <p>:</p>
Included files	

Title	Climate Change and Sustainability
ID	EGS5764
Person ID	1264726
Full Name	Annie Heaton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>I am heartened to see the focus on climate change in the proposed plan, and I support many of the proposals indicated in the Topic Paper on Climate Change and Sustainability, on renewable energy, community heating networks, reducing embodied carbon in construction materials, and the expectation for carbon offsets to be made. This is a rapidly evolving area, and with the national government commitment to net zero by 2050, the emphasis on natural capital accounting in the 25 year Environmental Plan and new building regulations, there are some fundamentals building blocks the plan is lacking to provide residents with a solid strategy on climate change and sustainability and reassure us of DBC's commitment.</p> <p>The starting point is that the creation of all new infrastructure, homes and commercial properties in Dacorum's future, as well as existing stock, must be aligned with the national commitment to net zero by 2050 that is established in law. Until all industries are themselves net zero, this will be extremely challenging to achieve in reality - as acknowledged in the Plan, the construction of houses and infrastructure in the coming years will result in additional CO2 emissions from construction, the production of building materials (e.g. cement, steel), the ongoing loss of the soils and vegetation on site - which limits future carbon storage potential - and the occupancy of new buildings. All of this appears to run counter to what is urgently demanded by the IPCC's 1.5C report (2018) and the subsequent 2050 net zero commitment made by the UK government. This Strategy for Growth must be a strategy for a future aligned with the 2015 Paris Agreement, and this Local Plan an opportunity for DBC to take a leadership position and make a big statement of intention on climate change.</p> <p>The Plan makes many laudable efforts, yet sadly it lacks the kind of vision that would inspire confidence that DBC is serious about meeting its climate obligations let alone determined to shape Paris-aligned growth. As a start, I recommend that Dacorum Borough Council goes on the front foot by introducing a policy of 'net carbon gain' for all new developments. This would signal DBC's acknowledgement of the apparent conflict between the high numbers of new homes required and the net zero targets, and the reality that any CO2 'compensation' or offset arrangement for new</p>

developments needs to allow for uncertainty about the size and delivery of the future gains from offsets. Net carbon gain would represent DBC's vision and determination on climate change.

The Plan currently shows inadequate regard to the CO2 impacts of the high housing numbers. In particular, there is insufficient information to demonstrate how CO2 emissions from the construction and occupation of these will align with central government's 2050 net zero target. This is a serious shortcoming of the draft plan, and leaves DBC open to the sort of legal challenge brought against South Oxford Council in January 2021.

In addition, the plan needs to demonstrate that it is backed by these basic building blocks:

- **Strong governance:** DBC is accountable to local residents, as well as to national government, for reaching the net zero by 2050 target. It should **provide clear lines of accountability** for Dacorum's CO2 emissions as a critical element in ensuring the workability of DBC's local plan and strategy for growth. Is the Chair of DBC accountable to its residents for ensuring CO2 emissions within the borough decline in line with net zero by 2050? Or the Chief Executive of DBC? If they were taking this accountability seriously, there would be more in the plan to ensure success: the plan would do more than 'educate' and 'encourage' decarbonisation in the words of the draft Plan, but ensure it is on track to meet the net zero target through **strong policy reflected in its contracts with suppliers, and its planning stipulations to developers, and clear CO2 assessments of new planned activities**. In any case, good governance means developing forms of indemnity by ensuring that the responsibility for future emissions is built into contracts with developers and suppliers. This is hinted at in places but needs to be clearly laid out in DBC policy.
- **A Roadmap:** a simple timeline of key interventions within a DBC Climate Action Plan that will lead to CO2 reductions over the Plan period, source by source, to reach net zero by 2050
- **CO2 accounting:** best practice and clarity on CO2 accounting would be demonstrated though:
 - a) A **Baseline** of CO2 emissions from housing, transport, land use and land use management. DEFRA figures for Dacorum are published in the Topic Paper on Climate Change and Sustainability, but this shows no specific provision for Green Belt land, which will be severely affected by new developments in the Local Plan.
- **CO2 projections** demonstrating how both existing activity within Dacorum and the activities envisaged in the Plan (including CO2 emissions from the destruction of Green Belt, together with emissions from 922 new homes a year and associated impact on private transport) will decline in line with national obligations. There appear to be no such projections within the plan, despite modelling by the Tyndall Centre indicating that Dacorum's emissions must reduce at a rate of 13.6% pa to reach net zero by 2041 (Climate Change and Sustainability Topic Paper).
- **b) Commitment to publishing CO2 accounts:** DBC should commit to publishing annual GHG accounts accessibly to ensure accountability not only for increases or reductions in emissions, but changes to the carbon storage assets within the Borough. (See separate CO2 accounts section below)
- **c) DBC Policy** regarding new property and infrastructure developments. As the Climate Change and Sustainability Topic Paper explains, "*Paragraph 20 of the NPPF highlights climate change as a key part of Strategic planning policy which local authorities are legally obliged to set out in their local plans*". Many good policy ideas are set out in this paper (e.g. carbon neutral homes by 2030, BREEAM Excellent requirements), but details of DBC policy which governs all developments (Dacorum Climate and Sustainability SPD) "will be produced separately". The

paper ends by stating the Council will refine the policy approach in response to comments received and any further evidence that the Council prepares. This is welcome. Since policy is core to the Local Plan, and so **a draft of this policy should be published for consultation**. For the purposes of this policy development, the following comments are offered:

- The proposed target of net zero homes by 2030 is welcome. However, the **energy efficiency standards specified** (2013 Part L regulations) and the requirement for a BREEAM Excellent rating are based on out of date recommendations from UK Green Building Council, and **have been superseded** by new government requirements announced in January 2021 for new homes to reduce CO2 by 35% to be introduced in 2021, and by 75-80% to start in 2025 (see below).
- The Climate Change and Sustainability Topic Paper states that “local authorities currently have powers under the Building and Energy Act 2008 to set energy efficiency standards in planning policy that are higher than Part L of the Building Regulations.” In tandem with the government’s requirement for net biodiversity gain, DBC policy should require a **net carbon gain** for all developments.
- **Developers should be required to provide projections of CO2 emissions** from any development at the planning stage and explain how they will achieve a net carbon gain over the lifetime of the property. These projections should account for CO2 emissions over the lifecycle of the development: from the destruction of natural CO2 sinks where land (particularly Green Belt) is disturbed in the course of development; embodied CO2 in materials used; CO2 emitted by the property during the use phase, and from the recycling or disposal of materials upon dismantling or demolition (so favouring the use of recyclable materials), and any certified offset programmes use. Tools for such purposes are in development by the World Business Council for Sustainable Development in conjunction with the World Green Building Council
- **Sustainable design and construction:** building should be designed so that materials can be re-used, to ensure their lowest carbon impact over the long term. In this way, developments may be considered as a stock of materials with a future value, rather than a one off cause of CO2 emissions and use of materials. In specifying low emissions materials, I am glad to see external standards identified. However these are out of date and need to be updated. DBC policy should adopt emerging standards for low emissions steel and concrete being developed by ResponsibleSteel, WBCSD and others. Where these are not available, they should require the latest best practice LCA global warming potential values, as advised by the UK Green Building Council.
- **DBC should build in the costs of net zero in its planning policy decisions today** by considering the cost of offsetting any remaining emissions to reach its ‘net zero’ goals. Policy should **ensure the developer remains contractually accountable for ensuring projected CO2 reductions** submitted at the planning stage are achieved in reality, within reasonable limits, with a clause requiring them to finance offsets where their obligations are not met.
- To assess this for major developments, developers should be required to deploy the BREEAM In Use tool after 5 years (mentioned in the Climate Change Topic Paper) and report the results to the appropriate committee of the Council for oversight and ensure offsets are made.

- **Carbon offsets:** Currently the draft Local Plan makes provision for two trees to be planted for each dwelling in major developments, or 100 sq m for non residential developments. This is a welcome improvement, but Policy DM26 needs to be strengthened to indicate requirements in terms of:
 - the amount of intended carbon sequestration anticipated from these trees over time,
 - the appropriate species to be selected,
 - how these trees will be managed to ensure maximum carbon and biodiversity gain over their lifetime
 - independent verification requirements for such offset schemes.
- being a minimum standard for **all new homes**, not only major developments, increasing with the projected impact of each development.
- As a resident, I observe that many past developer led tree planting projects are not well managed 5-10 years after their inception. I would therefore prefer to see a requirement for developers to make financial contributions to the dedicated Council Fund proposed rather than planting the trees themselves. **The Carbon Offset Fund itself should be managed by the Council on behalf of the residents**, and would be used by an in-house team with specialist Ecology knowledge, responsible for directly selecting, planting and managing the trees (and other schemes) over their lifetime to ensure they thrive and so maximise CO2 capture. I would propose that they are **certified against a credible scheme e.g. the Woodland Code**. Only where specialist local knowledge is available, for example, via the Boxmoor Trust, could third parties be contracted to utilise the Fund.

Action Plan: DBC has not as far as I am aware published its **Climate Action Plan** demonstrating the programmes it will undertake to ensure sufficient CO2 reductions are achieved and a net carbon gain achieved. This plan should be innovative and inspire the support of local residents. Ideas of what this might include are:

- A commitment to publishing Dacorum carbon accounts locally.
- A programme to ensure existing property and developments already approved before the adoption of the Local Plan become 'net zero' by 2030
- A renewed assessment of renewable energy opportunities, including rooftop solar on DBC and HCC buildings. And further support for community energy schemes owned by the community, which schools are currently discouraged from adopting by HCC.
- A Dacorum carbon sequestration plan, alongside demand side CO2 abatement measures, to increase the carbon storage within the borough, including (i) tree planting programme, backed the Woodland Carbon Code an independently audited credible certification scheme sponsored by central government; (ii) A programme with local landowners to improve CO2 sequestration on their land via soil improvement, grassland and woodland management .
- A Dacorum scheme requiring developers to not only offset future residual CO2 emissions (at an increasing % between now and 2030) but ensure a **net carbon gain** via a directly verified project (with long term management plans in place) or via credits from local projects in the above Woodland Code certification programme

Included files	
Title	Climate Change and Sustainability
ID	EGS5868
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>DBC declared a climate emergency a year ago. Despite this, the Strategy clearly prioritises economic growth & greenfield land development over concerns for the climate emergency.</p> <p>This strategy fails to take account of legislation and recommendations from various UK institutions on how carbon reduction plans have to be integral to development of local plans.</p> <p>A carbon reduction plan 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. I see a disconnect between DBC proposals and Herts CC Sustainability Plan.</p> <p>Water supply in this area is constrained being supplied by the local aquifer which also feeds our Chalk Streams. The Environment Agency says that abstraction is to be restricted to 'current' levels. This poses a challenge to the Infrastructure Plan and is a critical aspect of the proposal to increase dwelling numbers by over 20% in this locality. New supplies of water for this area are not likely to be possible until after 2030.</p> <p>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat waste water and sewage. This could take 10 years plus.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5884
Person ID	1264354
Full Name	Juliet Penaliggon

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Given the current global climate emergency in my view the whole plan should be geared around how the housing targets (reduced by half as mentioned elsewhere) can be met while minimising the impact on climate change and loss of biodiversity. This plan refers to many laudable aspirations - aiming to be carbon neutral by 2050 etc. but there do not seem to be any hard targets within this plan to help get us there. The 2030 target is less than 9 years away and covers much of this development plan period (2020-2038)! For example, if use of wood for building construction acts as a carbon sink then why is there not a specific proportion of the construction in wood required in the plan? Why is there not a target for a minimum proportion of homes to be fitted with ground source heat pumps, rather than just referring to allowing for retrofitting (which pushes the onus and cost onto future owners and will subsequently never happen). Similarly, specific minimal targets should be set for water conservation measures.</p> <p>Aside from the affordable housing, the houses in this area will go for a premium because of the desirable location and therefore developers will easily recoup the additional costs from 'bulk' fitting these sustainable options. In addition, such measures act as a valuable selling point as owners will avoid future utility bills. Therefore, rather than the plan merely requiring developers to submit a sustainability statement that may never be delivered in reality, specific minimum sustainability requirements should be laid down upfront as a requirement for developers, then their actual implementation monitored.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS5938
Person ID	1264785
Full Name	Thomas Lloyd-Evans
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Climate Change and Sustainability comment	As CPRE Herts has published, this plan lacks a coherent climate change and sustainability strategy. Green belt can never be regained once lost.
Included files	
Title	Climate Change and Sustainability
ID	EGS5958
Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate change should be high on the considerations of developers. Greenhouse gas emissions are mentioned, but should go further in stating that all new buildings must incorporate renewable energy - solar panels. heat pumps etc. It is not sufficient to use the carbon-offset argument of planting new trees
Included files	
Title	Climate Change and Sustainability
ID	EGS6023
Person ID	1264822
Full Name	JULES GARNER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	1 It is currently unclear how the plan will enable Dacorum borough council to meet its commitment to reduce carbon emissions across Council activities to net zero by
Included files	
Title	Climate Change and Sustainability
ID	EGS6041
Person ID	1264797
Full Name	Robert Diehl
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The plan has very little climate change and sustainability credentials. Many of the new sites in Berkhamsted are on land between the A41 and Shootersway. Given the centre of the town and the railway station is a fair distance away and also the hilly nature of the geography, many residents will drive their cars, no matter what the council says about cycle and walking routes.
Included files	
Title	Climate Change and Sustainability
ID	EGS6100
Person ID	1264816
Full Name	Christopher Nicholls
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS6116
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS6120
Person ID	1264826
Full Name	alanah cullen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The proposed local plan fails to demonstrate a pathway to local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF), and the 2004 Planning and Compulsory Purchase Act. An evidencebased carbon reduction plan is also required to meet the national climate obligations of net zero by 2050.</p> <p>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.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS6194
Person ID	1264872
Full Name	Ben Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Given the current global climate emergency in my view the whole plan should be geared around how the housing targets (reduced by half as mentioned elsewhere) can be met while minimising the impact on climate change and loss of biodiversity. This plan refers to many laudable aspirations - aiming to be carbon neutral by 2050 etc. but there do not seem to be any hard targets within this plan to help get us there. The 2030 target is less than 9 years away and covers much of this development plan period (2020-2038)! For example, if use of wood for building construction acts as a carbon sink then why is there not a specific proportion of the construction in wood required in the plan? Why is there not a target for a minimum proportion of homes to be fitted with ground source heat pumps, rather than just referring to allowing for retrofitting (which pushes the onus and cost onto future owners and will subsequently never happen). Similarly, specific minimal targets should be set for water conservation measures.</p> <p>Aside from the affordable housing, the houses in this area will go for a premium because of the desirable location and therefore developers will easily recoup the additional costs from 'bulk' fitting these sustainable options. In addition, such</p>

measures act as a valuable selling point as owners will avoid future utility bills. Therefore, rather than the plan merely requiring developers to submit a sustainability statement that may never be delivered in reality, specific minimum sustainability requirements should be laid down upfront as a requirement for developers, then their actual implementation monitored.

Included files

Title Climate Change and Sustainability

ID EGS6221

Person ID 1261819

Full Name Alex Rathmell

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment

Included files

Title Climate Change and Sustainability

ID EGS6250

Person ID 1264834

Full Name Ilina Jha

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No	
Climate Change and Sustainability comment	New developments will likely increase greenhouse gas emissions, so the council must not build more homes than is necessary. The Government number of 922 is, as said before, a starting point, not a target.
Included files	
Title	Climate Change and Sustainability
ID	EGS6273
Person ID	1264668
Full Name	Geraint Cooksley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>DM22- Design and construction</p> <ul style="list-style-type: none"> ○ Select only green developers- scrutinized and selected according to how green their business, practices, materials, energy feed are and that should be a priority. ○ Demand and prioritise for selection the submission of a Sustainability Statement with their application to demonstrate how the development minimises impact and contributes to the objectives set out in Policy SP10 - Climate Change Mitigation and Adaptation (pg. 104, 17.21). ○ Define with values what materials with low embodied carbon is. ○ Ensure that there is a number of mature trees planted/dwelling and a green space/forest per number of dwellings. ○ Demand always the use of recyclable materials = 0 waste when possible. ○ Energy for the house- demand heat pumps or any other carbon neutral sources. ○ Demand permeable ground surfaces, use of green roofs, green corridors (green infrastructure) and proposals for net-biodiversity gain and positive measures to support wildlife. <p>olicy DM23- Energy and Carbon emissions in new developments:</p> <ul style="list-style-type: none"> ○ Government 75-80% reduction in carbon emissions by 2025 and neutral by 2030- this demands to all plans in new development to be carbon neutral from the beginning.

- Prioritise on-site renewable energy generation
- Why carbon offsetting and not all carbon zero directly in a NEW development?.
- Prioritise the provision of on-site renewable energy generation, or provision and connection to decentralised low carbon energy sources.
- Ensure implement a recognised monitoring regime to assess the energy use, indoor air quality, and overheating risk for at least 10% or more of the proposed dwellings for the first five years of their occupancy, and ensure that the information recovered is provided to the applicable occupiers and to the planning authority.
- Select new residential development that targets certification to the Home Quality Mark and Passivhaus design standards and non-residential development that targets certification beyond BREEAM Excellent
- Proposals should be designed to ensure retrofitting to meet higher energy efficiency standards in future such as heat pumps or other low or zero carbon sources
- Favour Community Heat and Energy Networks

Policy DM24 - Low Carbon Community Heat and Energy Networks

- Create a site-wide community heat or energy network connect to an existing decentralised network
- Create a social and community infrastructure provision
- Policy DM25 -Stand-alone Renewable or Low Carbon Energy- design and potential for renewable or low carbon energy schemes will be given in Dacorum Climate Change and Sustainability SPD.
- any proposals within the Chilterns AONB or its setting are of an appropriate scale and do not adversely affect the natural beauty or purpose of the AONB
- locally important wildlife sites (including ecological corridors)and features cannot not be adversely affected;
- Policy DM26- Carbon offset.
- Why carbon offset if new development? It should ensure carbon neutrality from the beginning.

Included files

Title Climate Change and Sustainability

ID EGS6305

Person ID 1264884

Full Name Max Ansell

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Plans in Northchurch run counter to Dacorum's climate change strategy. the distance of the housing developments to transport centres and shops plus the steep hills making cycling inappropriate would lead to a huge increase in car usage and so pollution, congestion and noise. Older residents and children would suffer disproportionately
Included files	
Title	Climate Change and Sustainability
ID	EGS6386
Person ID	1262933
Full Name	James Cunningham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	This is really important but statements are motherhood and apply pie. Wil they be delivered!
Included files	
Title	Climate Change and Sustainability
ID	EGS6387
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Aspiring to manage development in terms of climate emergency and sustainability needs more concrete regulatory measures in place. Alluding to policy is not the same as enforcing its conditions. Water extraction is often set aside as outside the planning remit, for example, but this just transfers the responsibility for provision to Water Companies and is a recipe for environmentally unsustainable usage. There is no history of Planning supporting mitigation or resilience in Dacorum, so no public confidence. Encouraging developers towards sustainable low carbon is not the same as enforcing it.</p> <p>Biodiversity measures are not concrete enough for reliability. A proper audit would be better. Especially relevant would be precise targets for extending existing woodlands and hedgerows for carbon sequestration instead of relying on people planting trees in the gardens of their new housing developments.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS6445
Person ID	1264916
Full Name	Kathryn Spall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Although the council state that one of their strategic objectives is the "conserve and protect the natural environment", this is completely at odds with the proposal to build on large areas of the Green Belt. The local biodiversity will be very severely impacted, as will water resources.</p> <p>The reality is that as the proposed new building sites in Berkhamsted are a considerable distance from the town centre, there will inevitably be a huge increase in car use, with the consequent increase in air pollution and congestion. The plans as currently drafted are completely unsustainable.</p>

Included files	
Title	Climate Change and Sustainability
ID	EGS6478
Person ID	1264936
Full Name	Jane Cracknell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Building houses at the top of Swinggate Lane and behind Upper Hall Park is bad for the climate and sustainability as residents will need to use cars for almost all work, leisure and shopping.
Included files	
Title	Climate Change and Sustainability
ID	EGS6528
Person ID	1264731
Full Name	Graham Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I consider the requirements of energy conservation and CO2 embedding to be weak. For situations where this plan is going to exist into the 2030s there should be a commitment to significantly require high standards now, not later. Thus rather than just giving support for certification of residential development to the Home Quality Mark and Passivhaus

design standards (and non-residential development that targets certification beyond BREEAM Excellent) it should be making it a requirement.

Included files

Title Climate Change and Sustainability

ID EGS6540

Person ID 1264974

Full Name Catharine Shaw

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment As with previous comments - the major concern is that sites and numbers of houses are being proposed in this Plan with no clarity at all as to how the climate emergency policy ambitions will be achieved. For instance while transportation lies outside of Dacorum's remit to large extent, of Dacorum is to honour its own policy commitments it should ensure that its partners across other parts of government have viable and confirmed plans for appropriate public and emission free/low emission transport infrastructure provision to the developments before adopting these numbers and sites. In addition delaying requirements for net zero development to 2030 (more than half the planning period) risk very much encouraging hasty development at lower regulatory levels, that will cement carbon emissions into Dacorum development for the long term, and jeopardise net zero targets in reality. Net zero ambition should be required immediately, and choices based around that.

Included files

Title Climate Change and Sustainability

ID EGS6557

Person ID 1264697

Full Name Nicholas Wood

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The draft Local Plan, with its emphasis on so much Green Belt development is absolutely anathema to your own stated policies of Climate Change Mitigation and Adaptation.</p> <p>Speaking for the area I know best, my home town of Berkhamsted, it most obviously fails points 3a, 3c and most seriously 3h of your own SP10 policy. Large greenfield developments on the outskirts of a valley town, which is where you propose the vast bulk of future housing in Berkhamsted will be built, is going to force car usage over all other forms of transport. People hardly use buses, cycles or walking at all from the existing houses along Shootersway into the town centre. It's too far to walk, too steep to cycle and too ill served by public transport for any kind of bus usage to be practical. The people who currently live along that route overwhelmingly drive into the town centre. Another huge swathe of houses from Hall Park to Grims Ditch like you propose will only make the problem ten times worse. You can produce all the pie in the sky transport studies you like but everyone who lives in South Berkhamsted knows that's the truth. That's what your ill thought out proposals for Berkhamsted future housing would do to 'encourage the use of sustainable transport modes'. And to address your own points 3c, building over so much green belt land to the south of Berkhamsted, much of which is currently wooded, will hardly 'increase the area of habitats that fix and store carbon, including tree planting'. I'm sorry but you just can't put an eco fig leaf on this gibberish. If you want to build great swathes of new housing on green fields just say so, don't dress it up in sustainable credentials.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS6575
Person ID	494770
Full Name	Mr John Borton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	<p>The Council's declaration of a climate emergency is incompatible with the location of significant volume of additional housing in locations that are distant from the town centre and up steep hills. The scale of the proposed development makes a nonsense of the Council's commitment on Climate Change and Sustainability. The land between the town and the A41 is a 'green lung' and barrier between the by-pass and residential areas.</p> <p>I agree with the CPRE Herts reaction that the proposed Plan "fails to demonstrate a pathway to local carbon reductions" which is a requirement of the National Planning Policy Framework.</p> <p>I am concerned at the strain that the proposed developments will place on water supplies in the town. It would seem that increased demand for water can only be met by increased water extraction from the chalk aquifer and this will damage the unique chalk streams and chalk stream habitats which the area is famous for</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS6587
Person ID	1263380
Full Name	Martin Warden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS6601
Person ID	1264923
Full Name	Ken Douglas
Organisation Details	Secretary TRING IN TRANSITION

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Of all parts of the plan I've looked at this is the one where there appears to be the largest gap between expressed sentiment and anything actually tangible. Dissapointing and a little bewildering!</p> <p>Section 17 – specifically 17.1, 17.12 and 17.13 (pages 99,100)</p> <ul style="list-style-type: none"> It is not clear how the Climate Change Strategy and Action Plan relates to the Hertfordshire Climate Change and Sustainability Partnership , or the Sustainable Hertfordshire Strategy. <p>Policy SP10 ‘Climate Change Mitigation and Adaptation’ part 3d and 3e (page 100)</p> <ul style="list-style-type: none"> <i>“encouraging on-site renewable and low carbon energy sources on development sites, and stand-alone renewable energy or low carbon schemes”</i>. Given the increasing importance of mitigating action of all sorts, what does ‘encouraging’ mean? How could this be made a mandatory/planning condition instead? In the point below <i>‘requiring development to have high levels of thermal efficiency, including setting carbon emission targets where applicable’</i> the word <i>‘requiring’</i> implies something stronger. <p>Section 17.36 ‘Low Carbon Community Heat and Energy Networks’ (page 106)</p> <ul style="list-style-type: none"> This is a valuable part of the Local Plan in terms of energy generation; however, the content is out of date. For example the ‘zoning’ is a good start, but only covers 2 technologies and dates back to 2010 (technology has changed a lot). <p>Why not update this and be more expliut about renewable use. tring has a heritage of this and it presents a great opportunity (and excuse??) to insist on higher standards!</p> <p>Sections 17.41/42 ‘Stand-alone Renewable or Low Carbon Energy’</p> <ul style="list-style-type: none"> Comments as for point above. It is not clear how the Climate Change Strategy and Action Plan relates to the Hertfordshire Climate Change and Sustainability Partnership or Sustainable Hertfordshire <i>“encouraging on-site renewable and low carbon energy sources on development sites, and stand-alone renewable energy or low carbon schemes”</i>. Given the increasing importance of mitigating action of all sorts, what does ‘encouraging’ mean in this context? How could this be made a mandatory/planning condition instead? In the point below <i>‘requiring development to have high levels of thermal efficiency, including setting carbon emission targets where applicable’</i> the word <i>‘requiring’</i> implies something stronger.

- This is a valuable part of the Local Plan in terms of energy generation; however, the content is somewhat out of date

The 'zoning' is a good start, but only covers 2 technologies and dates back to 2010 (technology has changed a lot).

We would like to see this exercise fundamentally updated to include (realistic) wind turbine locations, rooftop solar (PV, thermal) potential (which is for both newbuild and retrofit) and possibly additional ground-mounted solar.

- Comments as for point above
- These points are by no means new, and the renewables sector has a wealth of experience regarding sensitive project development and implementation for wind/solar etc.

We welcome the mention of community energy projects – this could be a significant driver for employment, for example if community-funded/owned projects were given priority within planning decision-making. In these projects the benefit to the community is 100% clear.

Included files

Title Climate Change and Sustainability

ID EGS6606

Person ID 1265007

Full Name Duncan Brown

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment The draft plan has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

Included files

Title Climate Change and Sustainability

ID EGS6694

Person ID 1265019

Full Name	Yvonne Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I endorse the response of the chiltern countryside group
Included files	
Title	Climate Change and Sustainability
ID	EGS6711
Person ID	1265006
Full Name	Tracy Bownes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	CPRE has highlighted concerns - the plan has very little detail to substantiate the sustainability credentials.
Included files	
Title	Climate Change and Sustainability
ID	EGS6735
Person ID	1261257
Full Name	Simon Tuff

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	17.45
Included files	
Title	Climate Change and Sustainability
ID	EGS6756
Person ID	1264920
Full Name	Anna Wellings Purvis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The policies are fine but the plan does the opposite of contributing to net zero carbon, because it lacks gardens or trees in Hemel Hempstead to offset the fields lost, and because the increased traffic will cause pollution which must also be offset by significant investment in public transport.</p> <p>It is faster for me as a public transport user to get to London via St Albans than Hemel rail station because there are no longer direct buses from Adeyfield to the rail station. This plan is too vague in infrastructure provision and after so many broken promises by the Government it would need to begin one of the infrastructure projects we desperately need to have my approval.</p>
Included files	
Title	Climate Change and Sustainability

ID	EGS6794
Person ID	1265036
Full Name	Tom Burrows
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The affect on the local environement from the size of these developments will be devastating.
Included files	
Title	Climate Change and Sustainability
ID	EGS6801
Person ID	1261827
Full Name	Ian Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<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>How is this sustainable? This encourages car use despite cycling and walkways with no real incentive to give cars up. The LP doesn't know what will happen when the pandemic is over or how the world will look after. The trains system</p>

locally is laughable during peak hours and many drive to Chesham to get the underground rather than sustain the journey in overcrowded trains.

Included files

Title Climate Change and Sustainability

ID EGS6823

Person ID 1263500

Full Name Jessica Haigh

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment Climate Change and sustainability – has very few climate change and sustainability credentials as highlighted by CPRE Herts published concerns. Additionally, will the use of solar panels, renewable energy, and planting trees on mass, be used to offset the carbon used when building these developments?

Additionally, by building on the green belt land, reducing wildlife and natural habitats, you are causing irreversible damage to the environment. None of this can be justified. I seriously advise you to reconsider this and use as little green-belt land as possible. Brownfield sites, as well as old retail and commercial properties, should be used in the first instance.

Included files

Title Climate Change and Sustainability

ID EGS6847

Person ID 1265079

Full Name Darly Rattigna

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>the hilltop, edge of town locations proposed in berkhamsted will necessitate more car journeys. cycling and walking is not an option given the distances to the station. the housing in berkhamsted will always be for London based workers given the high salary needed to pay for a house that will be built on expensive land, and as a result, such workers will not be cycling or walking such long distances to and from the station</p> <p>and given how many bikes are stolen from the station, those that do cycle will soon stop</p> <p>the Bk01 South Berkhamsted site has 800 units proposed. given a 2 adult household, that will be an additional 3200 car journeys a day given that cycling and walking is not an option given the steep hills and distance to the train station</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS6887
Person ID	1265094
Full Name	Rebecca Gurnham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>I am relieved to see that there is acceptance of the Climate Emergency: "and left unabated will have catastrophic effects on the way we live our lives. We declared a Climate Emergency in July 2019 to respond to these challenges and, through this, have committed to reducing carbon emissions across Council activities to net zero by 2030." However, I cannot see nor understand how this housing plan adheres to any attempt to reach our critical target. Building on green belt, pollution increase and endangering biodiversity, chalk streams and wildlife is a recipe for complete an utter failure.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS6898

Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Climate Change and Sustainability comment	
Included files	
Title	Climate Change and Sustainability
ID	EGS6920
Person ID	1264453
Full Name	Fiona Hinton
Organisation Details	Myself
Agent ID	1264426
Agent Name	Fiona Hinton
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	CPRE Herts have already published their concerns regarding this proposal, and I highlight this. The government also emphasise their commitment to environmental concerns. This strategy, however, is proposes decimating green belt land to build houses in locations that will promote much larger amounts of vehicles on already congested roads. This should be reviewed with the aim of better supporting the national climate change commitments.
Included files	
Title	Climate Change and Sustainability

ID	EGS6938
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>I don't feel full consideration of the scale and impact of the development has been considered in terms of Climate Change and Sustainability. This should be considered at a national level (in terms of development with higher dependence on cars in more rural areas, vs lower dependence in more urban areas).</p> <p>I don't feel that a comprehensive assessment of biodiversity and biodiversity value changes has been included or published as part of the plan...so how can we understand if the proposal has met the 10% national biodiversity national requirement.</p> <p>There will also be further pressure and degradation of the river gade which is a globally rare chalk stream. Increased demand for water and increase in temperature will damage our local biodiversity.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS6968
Person ID	1265105
Full Name	Jonathan Tay
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	The Council declared a climate change emergency in 2019, and now intends to build 16.5k new homes, with the inevitable increase in emmissions. If the Council was serious about climate change, it would build far fewer house, but make more enhancements to sustainable transport and green energy for existing homes.
Included files	
Title	Climate Change and Sustainability
ID	EGS7018
Person ID	1265116
Full Name	andrew Koutsou
Organisation Details	Me - resident
Agent ID	1265101
Agent Name	andrew koutsou
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	the development in tring changes the landscape of the town completely. Destroying much of the natural beauty around the town.
Included files	
Title	Climate Change and Sustainability
ID	EGS7050
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Climate Change and Sustainability comment	Too late to elaborate.
Included files	
Title	Climate Change and Sustainability
ID	EGS7077
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I support all moves to ensure that Dacorum plays its part in helping to overcome this vital global issue, for the sake of the many generations of people yet to come.
Included files	
Title	Climate Change and Sustainability
ID	EGS7109
Person ID	1262099
Full Name	Chris Taylor
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	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 action plans. Listen to the experts, build it into the plan and help reduce climate change and promote sustainability.
Included files	
Title	Climate Change and Sustainability
ID	EGS7132
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate. The destruction of huge areas of countryside in the Chilterns Area of Outstanding Natural Beauty is a total betrayal of any pretense of sustainability in this plan.
Included files	
Title	Climate Change and Sustainability
ID	EGS7169
Person ID	1265129
Full Name	Karen Foxwell-Moss
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	CPRE Herts has published its concerns about the lack of climate change and sustainability credentials and I refer you to these 'fully evidenced and justified' concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS7170
Person ID	1265142
Full Name	Alan Anderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Re 17.12 / Policy SP10, I believe developers should be specifically required to provide solar panels on all roofs for which it is appropriate. The proposed wording, (encourage & all kinds of renewable energy generation), is far too weak if we are to combat developers whinging about viability - we need to get tough specifically on solar energy generation.</p> <p>Re 17.41 / Policy DM25, I believe we need, at the risk of contradicting the NPPF, to permit, in specific cases which would not harm the landscape, the development of solar farms in the Green Belt - with obvious check/balance, we should in my view be referring these cases to the SoS with our support, rather than rejecting them purely because they are in the Green Belt. (If housing delivery is a special circumstance, then so should solar energy farms!!)</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS7204
Person ID	1265147

Full Name	Julian Eaton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>It is very positive to see these policies at the heart of the strategy.</p> <p>I would hope to see clearer commitments to specific actions to meet the goals of net zero development by 2030. For example stating that all housing will be highly insulated and use all-electric heating systems, and install with local generation like solar on housing.</p> <p>Safe, well-designed routes for people to walk and cycle, rather than drive, into shopping areas (High Street) and the station is not only good for the environment, but good for health. If people are not given the means to more easily cycle or walk than drive, then lifestyles will not change. It is the responsibility of local government in designing new housing developments to facilitate healthier and more sustainable livelihoods</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS7206
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	If we're really keen on protecting the environment, then don't build on green belt land! Tring is surrounded by AONB - please don't start eating into that!

And a 50% increase in the number of vehicles in Tring will have a hugely detrimental effect on the environment - and climate change!

Included files

Title Climate Change and Sustainability

ID EGS7238

Person ID 1264956

Full Name Caroline Heard

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Climate Change and Sustainability comment Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

Included files

Title Climate Change and Sustainability

ID EGS7302

Person ID 358532

Full Name Ms Gillian Culham

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Climate Change and Sustainability comment	P102 – Figure 4 waste hierarchy. My view is: incineration with energy recovery.
Included files	
Title	Climate Change and Sustainability
ID	EGS7450
Person ID	1145699
Full Name	Mr Paul Walker
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>Climate, water and waste impact</p> <p>There is no mention in the strategy on how the plans with cope with the extra strain on water supply and waste management.</p> <p>Currently we draw a vast amount of water from out chalk aquifer, and drawing more would have a huge impact on our local environment, potentially threatening our local chalk streams and rivers, which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006.</p> <p>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.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS7632
Person ID	1265747
Full Name	STEPHANIE BRADLEY
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>I would like to make the following points:</p> <p>To hold such a detailed plan consultation in the midst of a worldwide pandemic is questionable. People are far more focused on other issues crucial to their survival and have been over the past year. This is borne out by the tiny number of responses you have received.</p> <p>The plan was presented in a way that was not user friendly, salient points were not easily picked out, even by those who are highly educated, let alone those are not. This type of plan should be presented in a clear and concise but fully explicit 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> <p>Villages will cease to be self-sustaining and become car-linked hubs to the main towns.</p>

Social housing needs for the area will not be met by this plan.

The projected use of greenbelt land should not be pursued and the greenbelt should be protected. Alternative locations must be sourced as a priority and the greenbelt protected.

There is no mention of the Glover report which proposes that the AoNB becomes a National Park. This plan goes against this report.

Climate Change considerations are key. The plan does not address how house building and subsequent use, transport and infrastructure will align with the Government 2025 net zero target. The carbon cost of using greenbelt land is key.

Many of the documents referenced are in draft form and not up to date., including the habitats assessment (2006). There are no Habitats Regulations Assessment Documents .

Biodiversity value change assessments should be included and verified independently.

Most of the developments will be taken by commuters rather than locals as not affordable for locals. Priority and affordability for locals should be key.

Inadequate transport and infrastructure: Provision must be made for sustainable transport from existing and new developments. Most of the new developments are out of town and the car cannot be prioritised for travel to stations (most of these developments will be for commuters and few locals). Bicycle travel must be prioritised. I am too scared to cycle on the roads. My husband has had 3 serious accidents (broken collarbones twice) due to potholes.

The people of Dacorum must have this plan explained to them so that they can understand the full impact of the plan proposals and hopefully realise that it is highly detrimental to future generations and can challenge it accordingly. Having spoken to them, almost all of my friends have no real idea about any of it and the seriousness of it.

The points above should be addressed and the plan put out for consultation in a correct manner once the world returns to some sense of normal... our future depends on it.

Included files

Title

Climate Change and Sustainability

ID	EGS7666
Person ID	1250022
Full Name	Mr Michael Ridley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>4 Protection and enhancement of biodiversity and action to combat climate change are not rigorous or sufficiently date stamped to guarantee compliance by developers.</p> <p>While considerable emphasis is placed on sustainability, the wording is aspirational rather than mandatory.</p> <p>Biodiversity enhancement using offsets are extremely difficult to achieve and existing technical innovations to reduce carbon emissions could be implemented by dates earlier than specified.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS7735
Person ID	1265778
Full Name	Councillor Lara Pringle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	<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>
Included files	
Title	Climate Change and Sustainability
ID	EGS7774
Person ID	1265891
Full Name	james arnold
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	All developers should be forced to ensure that their develops meet high sustainability levels, and given that they stand to make such huge sums of money by ruining the very essence of our town, they should also be forced, not only to make the land available but build the facilities needed whether that is medical, sports or schools facilities.
Included files	
Title	Climate Change and Sustainability
ID	EGS7787
Person ID	1265904
Full Name	Mrs Alex Brown
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>As a long term resident of Berkhamsted, I am writing to register my vehement objections to the 'Emerging Strategy For Growth (2020 - 2038)'</p> <p>My first objection focuses on ecological and climate issues that will arise from the planned massacre of Green Belt Land. We moved to Berkhamsted nearly 10 years ago, from London - we lived in a borough on the outskirts, but moved to avoid the pollution and overcrowding caused by continuous development and destruction of green belt land. My eldest son - now aged 13, had developed asthmatic tendencies, and we decided to move somewhere where there was a quality of air. Rapidly, his asthma dissapeared. I mention this, as one of my objections is based on the environmental impact that will be caused by the proposed development and destruction of the green belt land, and the impact this will have on air quality amongst other things. I draw your attention to the case of the death of 9 year old Ella Kissi-Debrah, who has become the worlds first death attributed to air pollution - right here in the UK. The added pollution from the additional homes as well as the cars these homes will bring to the borough will mean we run a very strong risk of contributing to numerous other pollution related deaths, as well as a pointless and avoidable strain on an already strained NHS.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS7800
Person ID	1148738
Full Name	Ian and Claire Field
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

Included files	
Title	Climate Change and Sustainability
ID	EGS7870
Person ID	1265975
Full Name	Clare Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS7906
Person ID	1265991
Full Name	NICHOLAS MORGAN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Climate Change and Sustainability
ID	EGS7921
Person ID	1262335
Full Name	Penelope Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	To whom it may concern. 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS7923
Person ID	1262335
Full Name	Penelope Harrison
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	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.
Included files	
Title	Climate Change and Sustainability
ID	EGS7925
Person ID	1262335
Full Name	Penelope Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<ul style="list-style-type: none"> • Dacorum to implement a local plan that includes firm and ambitious sustainable commitments. All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas

boilers) and each home should collect rain water for toilets. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

Included files

Title Climate Change and Sustainability

ID EGS7940

Person ID 1265997

Full Name ROSE SHERIDAN

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

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

Included files

Title Climate Change and Sustainability

ID EGS7967

Person ID 1266006

Full Name SUE ELLERAY

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>3/ Do you have any specific comments about the guiding policies?</p> <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>
Included files	
Title	Climate Change and Sustainability
ID	EGS7991
Person ID	1266015
Full Name	SOPHIE WHITTON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	a) 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS8041
Person ID	1266036
Full Name	Dr R J Stubbs
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Sustainability; we already have a difficult water supply situation in the Borough under drought conditions. The amount of extra housing proposed will result in greater abstraction from the aquifer which will reduce the flow in the local chalk streams, with detriment to wild life. At the other end of the water system, there is treatment of waste water and sewage. This would necessitate the building of more infrastructure, something which is likely to take many years if not a decade to complete.
Included files	
Title	Climate Change and Sustainability
ID	EGS8043
Person ID	1265099
Full Name	Helen & Matt Thompson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	It's encouraging to see impact on the environment being stated as a guiding principle in the plans but I think we are at a critical time now where it would be more responsible and better received if Dacorum committed to specific environmental standards/ goals around the impact of all the development proposed on climate and the environment - I.e. Dacorum should set a target that all development will be carbon neutral, nature positive. I think there are numerous ways this could be achieved thinking about water, waste, biodiversity etc and still keep the community spirit that everyone benefits from.
Included files	
Title	Climate Change and Sustainability
ID	EGS8058
Person ID	1266042
Full Name	Hannah Briggs
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	I am finding it hard to understand how the town can be moving forward to plan for a low carbon future when it is about largely expand both the town population but also area. As the majority of houses proposed are to be built on the outskirts of certain towns it would also increase the number of cars. As residents are further away from both transport links as well as town facilities e.g. shops, banks etc they are more likely to drive thus producing more greenhouse gases within Dacorum. Many of the sites are also proposed on Green Belt land which has been designated as such to prevent development which would harm the environment of the Chilterns. I would encourage the council to reconsider using more brownfield sites instead so as not to damage Green Belt land.
Included files	
Title	Climate Change and Sustainability
ID	EGS8085
Person ID	1266049

Full Name	Mike Plowman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS8101
Person ID	1266058
Full Name	Charlotte Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	3) Climate change is an important issue. For a development of this magnitude I would anticipate an overall covenant to use sustainable energy. There is also a necessary provision of green space for the inhabitants and for carbon balancing. The historic designation of green belt land to contain London would be broken. Is your policy to create another city in Hertfordshire? If so an adequate water source and drainage facilities are essential. Also medical and education services with an adequate road and rail network. This could be an area where new plans, structures and practises are implemented, to your credit. There is no evidence of this in your planned number of houses onto an area already at breaking point. You plan instead creates a disaster waiting to happen.
Included files	

Title	Climate Change and Sustainability
ID	EGS8192
Person ID	1207825
Full Name	Claire Hobson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>I am responding to the consultation on behalf of myself and the X adults who live with me.</p> <p>I gave up trying to use the portal as it was impossible to work through all the documentation to answer the questions - why wasn't a simple questionnaire set up, separate from the documentation? This is one of the worst examples of a system set up for the benefit of the people receiving and collating responses rather than making it easy for citizens to reply. This is an unacceptable barrier to responding.</p> <p>I have lived in Boxmoor for over 23 years, I went to senior school in Warners End and until the pandemic commuted to London daily. I brought up my family here and have loved being close to the town centre, the canal and plenty of green space that sets Hemel aside from many post war developments.</p> <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 on a screen, even for me an IT literate person who has a professional office set up at home, with a large screen/keyboard/mouse etc. For those who only have a tablet or phone it is impossible to engage in any meaningful way with the consultation. I apologise in advance for any typos - I am exhausted from all the extra work I have had to do in the pandemic due to public services being closed for a year and more people in the house and community to look after.</p> <p>I am educated to MSc level, a 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.</p> <p>I urge councillors and officers to take a step back and put themselves in the shoes of residents when designing huge and life-changing consultations. This has not put the council in a good light. Some local councillors have taken to social media to publicise the consultation but there was very little from the council. This consultation should have been postponed</p>

or extended to beyond lockdowns and school closures to enable a full and open review and engagement with the whole community.

We support the responses of OneVoice, Chiltern Society and the Liberal Democrat Group, among others, so I will not seek to duplicate their detailed points here, but focus on the main points of concern for a long time resident of Boxmoor, a jewel in Hemel's crown.

Greenfield/greenbelt

The green belt should be protected at all costs, and brownfield sites prioritised over any permanent destruction of greenbelt land. The council has said in public council meetings that they will protect greenbelt to the death but this is not what the consultation says and this is what has enraged so many residents.

Housing requirement and council tactics (Q1)

Too many houses, too few affordable homes.

It is absolutely clear that the number of houses supposedly held to our temples is far far too many on any rationale and evidence-based up to date analysis. The plan is woefully short on ensuring a large proportion of social/affordable housing, which is what residents of Dacorum need. The council has failed its citizens by refusing to face up to the Government and push back on the numbers. To throw the pass to the community in the middle of a pandemic with a consultation that proposes an eye-watering and irrevocable destruction of greenbelt and increase in town sizes of Berkhamsted and Tring is incomprehensible. This is an incredibly risky strategy in the middle of a pandemic when you will not have reached a significant proportion of the community die to pandemic restrictions. There are still more people in Dacorum who don't know about the consultation or its life-changing implications than there are who do know. And of those who do know, how many of them will have the time or energy to reply substantively? Please, on behalf of your residents, fight back at the government figures and listen to us. To ignore any criticism as politically motivated blinds you to listening to what we have to say *as people who live here and will live here, hopefully alongside the next generation, for the rest of our lives - decades* is rude at best and incredibly insulting and not in the interests of what's best for Dacorum at worst. Other councils have fought back, why didn't we? Why didn't you agree the tactics with the residents whose lives will be affected by the new Local Plan?

The evidence base for the number of houses needed in Dacorum should be the 2014 ONS numbers and not 2018.

London Road development

4 storeys max at the station.

Another case of the Council not appearing to listen...in the most recent consultation on the station development, the overwhelming response from residents was to limit any development to 4 storeys to protect the local scenery, including overlooking the ancient grazing land of Boxmoor Trust and the view of Roughdown common and the fields beyond from resident in the heart of Boxmoor village. Why does the current plan say '8 storeys or more'??? What is the point of consultation?

It is clear to anyone who lives in the immediate area or who travels along London Road to and from town and Apsley or the A41 that height is a given at the Plough roundabout and at the scarred land and buildings next to Aldi at the A41 Junction.

There is scope to develop the ugly brownfield sites along London road opposite the moor, eg around the old gas works and near the trainline between the A41 and the roundabout at Roughdown road.

The area between Roughdown Road and the station roundabout must remain low rise to protect the street scene as Hemel moves into more green land towards Box Lane. I will fight any proposal to have higher than 4 storeys along this stretch of road and at the station.

Who are the new homes for?

The original proposals for the station development showed apartments that were clearly for commuters, which would be certain to pull people from London into the areas and with inadequate numbers of affordable properties, would not help local people looking to get onto the property ladder.

Commercial/retail at the station

Lockdown has impacted local businesses heavily and the council should be very cautious about approving retail space at the station that could take business away from Boxmoor village centre or town centre, the latter having taken a huge hit from multiple lockdowns. With the town walkable for the majority of people who would live in starter apartments like those proposed for the station development and regular bus services to town, there is limited rationale to have a supermarket or too many restaurant or food businesses at the station location.

Sustainability/climate change

There is nothing in this plan to reassure me that we would have sufficient water to provide for all of the new homes, nor that the council is acting NOW on the climate emergency they declared. An emergency means taking action immediately and we have seen far too little action and too few ideas in this plan, contradicted by the destruction of the greenbelt etc. The council has also agreed to protect the area's unique chalk streams which are essential to maintaining a balanced ecology. These are at risk now and adding too many more houses will impact them further.

The planned housing should be carbon neutral at worst and negative at best. The plan is woefully unambitious on this.

Infrastructure

The infrastructure plan lacks detail on how the roads and cycle lanes will be built/improved and designed to reduce car use. The council needs to be far more proactive, imaginative and positive about designing for a low carbon future and helping residents live in uncongested places.

In summary

There is insufficient evidence of housing need to support the level of development (Q8). Full exploitation of brownfield sites for the Local Plan is not fully evidenced. So the Plan fails to meet Section 137 of the NPPF, which specifies the exceptional circumstances that need to exist to justify changes to Green Belt boundaries.

PLEASE LISTEN TO US - use the citizen's panel and have one for each area in the plan so we can co-design housing, infrastructure and space together. No one knows the area and its needs better than the people who live here. There are so many good people who work for the council and have worked so very hard on this plan but this proposal is cloth-eared, unambitious and risks ruining the lives and the enjoyment of Hemel and Dacourm's green spaces forever.

Included files

Title Climate Change and Sustainability

ID EGS8211

Person ID 1158423

Full Name Richard Frankel

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment 3 Failure to address climate concern issues. Local Plans are legally obliged to contain evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy. The proposed plan does not meet these obligations.

Included files

Title Climate Change and Sustainability

ID EGS8223

Person ID 1266154

Full Name Iain Smith

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Climate Change and Sustainability comment	(17): Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS8344
Person ID	1266200
Full Name	ROGER HANDS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Climate Change and Sustainability comment	Section 17.9 The statistics in chapter 14 of NPPF say that the planning system must account for mitigation and adaptation for climate change taking into account flood risk, water supply, biodiversity and land use. Will building materials be sourced from ethical , sustainable supplies. Is there a risk that our buildings will be constructed to the detriment of an ecosystem elsewhere in the world. How will the council ensure that developers will use material from ethical sources, who exactly will ensure this?
Included files	
Title	Climate Change and Sustainability
ID	EGS8358
Person ID	211117
Full Name	Mr Michael Heylin
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Section 17.9 The statistics in chapter 14 of NPPF say that the planning system must account for mitigation and adaptation for climate change taking into account flood risk, water supply, biodiversity and land use. Will building materials be sourced from ethical , sustainable supplies. Is there a risk that our buildings will be constructed to the detriment of an ecosystem elsewhere in the world. How will the council ensure that developers will use material from ethical sources, who exactly will ensure this?
Included files	
Title	Climate Change and Sustainability
ID	EGS8372
Person ID	1266205
Full Name	DI HAMMOND
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Section 17.9 The statistics in chapter 14 of NPPF say that the planning system must account for mitigation and adaptation for climate change taking into account flood risk, water supply, biodiversity and land use. Will building materials be sourced from ethical , sustainable supplies. Is there a risk that our buildings will be constructed to the detriment of an ecosystem elsewhere in the world. How will the council ensure that developers will use material from ethical sources, who exactly will ensure this?
Included files	
Title	Climate Change and Sustainability
ID	EGS8470
Person ID	495878

Full Name	Ms Anna Hanson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Environment</p> <p>The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council</p> <p>Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS8481
Person ID	1266302
Full Name	Gareth Garner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	1 It is currently unclear how the plan will enable Dacorum borough council to meet its commitment to reduce carbon emissions across Council activities to net zero by 2030
Included files	

Title	Climate Change and Sustainability
ID	EGS8547
Person ID	211354
Full Name	Mrs Laura Sanderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>It is not enough for DBC to call a climate emergency and then develop a housing growth plan that locates developments in remote unsustainable locations that will by definition work against the worthy aims of the Climate Emergency initiative. It is also true that a single large-scale development or new town in one area offers the opportunity for infrastructure investment such as district heating, renewable energy and carbon neutral transport modes etc. that smaller developments cannot. BRAG accepts that the Garden Communities of north Hemel, HH01 and HH02 has that scale. In contrast, the proposals for South Berkhamsted and the other ridge-top Green Belt sites on the southern perimeter of the town will remove bio-diversity, and introduce non porous surfaces and pollution to a densely populated, high traffic area. In short, these sites can only contribute to the effects of climate change, regardless of policy statements.</p> <p>The Green Belt land between Berkhamsted and the A41 had previously been designated as an important ‘Green Lung’ for the town. That designation has clearly been dropped completely. In truth, if DBC had wanted to be bold and display a real commitment to the ‘Climate Emergency’ the plan could have highlighted how the health of those ‘Green Lungs’ could be improved by potentially using the land to expand historic woodland along with other bio-diversity improvements, rather than losing productive land in the chase for ‘targets’ that don’t exist.</p> <p>As CPRE has said, “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.....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, wellbeing and social inclusion. There is no evidence in the proposed local plan of such an approach.”</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS8575

Person ID	1266567
Full Name	CAROLINE SMALES
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS8617
Person ID	1266595
Full Name	SHARON MACARTHUR-POWELL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	3/ Do you have any specific comments about the guiding policies? — 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.
Included files	
Title	Climate Change and Sustainability

ID	EGS8627
Person ID	1266604
Full Name	SEB BELOE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	3/ Do you have any specific comments about the guiding policies? — 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS8639
Person ID	1266607
Full Name	RACHEL POWELL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	<p>3/ Do you have any specific comments about the guiding policies?</p> <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>
Included files	
Title	Climate Change and Sustainability
ID	EGS8659
Person ID	1248896
Full Name	Ashleigh Genco
Organisation Details	Harrow Estates plc
Agent ID	1258542
Agent Name	Samantha Ryan
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Policy DM23 – Energy and Carbon Emissions in New Development: As part of the Redrow Group is strongly committed to ensuring development takes positive steps towards addressing the effects of climate change and better living. Those commitments will be embodied in development of the east of Tring growth area. The cost implications will need be explored through the Viability Appraisal of the plan (see also response to Q7).</p>
Included files	
Title	Climate Change and Sustainability

ID	EGS8673
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>The county council declared a climate emergency in July 2019, as a response to the need to act locally, having observed the global impacts of climate change including those from within Hertfordshire; dry riverbeds, reduced water supply, intense weather events, localised flooding and Hertfordshire specific loss of habitat and species. The county council has since published the Sustainable Hertfordshire Strategy which outlines HCC's nine ambitions as to how the authority will lead as an organisation and enable and inspire a sustainable county.</p> <p>The county council is very aware that action cannot be taken alone. In parallel to the work of HCC, all ten Hertfordshire authorities have unanimously agreed that a countywide approach to tackling climate change and ensuring sustainable development principles are at the forefront of the growth agenda. The Hertfordshire Climate Change and Sustainability Partnership was created in early 2020, which consists of all LPAs and the Local Enterprise Partnership (LEP).</p> <p>Four priority areas for action were identified which are Water, Carbon, Biodiversity and Transport. The county council has an officer working group to support the partnership and four subgroups to undertake the work on each. The primary purpose of the four subgroups is to prepare action plans for each of the priority areas and these action plans will cover which are resilience, mitigation and adaptation. Planning has a significant role to play in the development and implementation of suitable policies and this too will be reflected in action plans.</p> <p>It is evident that great care and thought has gone into the plan and has taken into account national guidance, including the forthcoming Environment It is encouraging to see that the plan's spatial vision is looking to stimulate sustainable economic growth; for example, through the development of green technology, with a particular focus on local supply chains and the circular economy (Hemel Garden Communities Vision and that future developments are built to a Passivhaus or BREEAM Excellent standard.</p> <p><u>General comments</u></p> <p>The following national and international policies, plans and initiatives should also be considered:</p> <ul style="list-style-type: none"> • The government's 25 Year Environment Plan;

- Paris Agreement 2015;
- SDGs – recognising that improving health, education, reducing inequality, and spurring economic growth go hand in hand with tackling climate

The co-benefits of the proposed natural climate solutions highlighted in the plan should be considered; for example, how planting trees not only captures carbon but also absorbs pollutant gases, prevents flooding, improves soil quality, improves the health of residents

The plan briefly mentions that planning should minimise vulnerability and improve resilience and it is clear through the evidence base that the natural capital assets have been identified in the local area. However, the mapping of vulnerable assets appears to be missing and the borough council may want to review habitat vulnerability using Natural England’s National Biodiversity Climate Change Vulnerability Model to identify priority action for developers to increase resilience.

Policy SP10: Climate Change Mitigation and Adaptation

Lead Local Flood Authority. It is considered that developments avoiding areas of flood risk, as stated in paragraph 4b, needs to account for current and predicted future flood risk. This paragraph also indicates the need for new development to reduce flood risk elsewhere, although this is not mentioned particularly in other areas of the document and needs to be strengthened as a

The Level 1 SFRA should also be included in the relevant evidence and supporting guidance base at the end of this policy.

Sustainability. The county council supports the use of green infrastructure and other nature-based solutions that are to be used to provide resilience in new developments, in order to reduce flood risk, tackle urban heat effects and provide solar shading. It is suggested that the policy emphasises that green roofs and walls are also resilient to future climates.

Transport. The wording within paragraph h) should be strengthened, as enabling sustainable journeys and prioritising them over private vehicles is critical to improving overall sustainability:

- 1 ~~encouraging the use of sustainable transport modes in all new development;~~ designing new development to prioritise sustainable transport modes; and

Mitigation measures should also include requiring development to include provision for electric vehicle charging.

Paragraph 17.17

Minerals & Waste Planning. The emerging WLP will be requiring development proposals to be supported by a comprehensive Circular Economy Statement in place of Site Waste Management Plans (SWMPs) that are referred to in this Please refer to proposed Strategic Policy 15 of the Draft Waste Local Plan.

The wording within the paragraph should therefore be revised as follows:

“The design and construction of buildings should allow for the easy recovery and recycling of materials at the end of the building’s life. Developers are encouraged to implement a ~~Site Waste Management Plan (SWMP)~~ Circular Economy Statement to help manage materials more effectively and reduce waste.”

Policy DM22: Sustainable Design and Construction

Lead Local Flood Authority. Adaptation measures that are mentioned in paragraph 4a of this policy that aim to minimise water usage, could be better phrased, as in this context it refers to reducing demand on public water supply rather than water. The use of SuDS as an example of managing flooding and contributing to the sustainable use of water is supported. It is considered that the Climate and Sustainability SPD that is to be produced and mentioned in paragraph 6, should ideally integrate with the published SFRA Level.

Minerals & Waste Planning. Reference to the need to implement a Circular Economy Statement should also be included within this policy as suggested below:

“5. Sustainability statements will be assessed on their merits but with an expectation that all measures should be satisfactorily met unless there is clear and convincing evidence as to why any measure(s) cannot be implemented, and if so, that alternative sustainability measures should be proposed. Proposals that exceed the requirements will be supported. Developers should also implement a Circular Economy Statement to help manage materials more effectively and reduce waste.”

Transport. The policy needs to include provision for the protection of walking, cycling and public transport routes (including rights of way) during construction, including from construction vehicles off site. It is therefore suggested that an additional paragraph is added to the section titled ‘mitigation measures’ as follows:

1 Mitigation measures

- 1 the protection of walking, cycling and public transport routes (including rights of way) during construction, including from construction vehicles off site needs to be considered.

Policy DM23: Energy and Carbon Emissions in New Development

Sustainability. Clarification is sought in relation to the type of energy performance standard that is quoted in paragraph 1, (i). It is also considered that the policy should be considering improving water efficiency and flood resistance and resilience measures.

The LPA may want to undertake risk assessments of the retrofit building stock for overheating/flooding under a range of future climate scenarios and adapt the retrofit to meet identified challenges. Possible guidance are:

- Your Home in a Changing Climate: retrofitting existing homes for climate change impact;
- Retrofitting Housing: a business case and checklist for retrofits

Policy DM25: Stand-alone Renewable or Low Carbon Energy

Ecology. This policy seeks to promote a reduction in carbon emissions by making provision for renewable energy generation and applies relevant criteria to inform future proposals which include a requirement that: *“locally important wildlife sites ... and features would not be adversely”* There is inconsistency with ‘Policy DM28: Protection of Sites’ and HCC’s comments relating to that policy should be referred to.

Policy DM26: Carbon Offsetting

Sustainability. The county council supports the borough council's offset fund for developments that cannot meet the plan's greenhouse gas requirements on- However, it is considered that the policy should include an offsetting hierarchy i.e. funds channelled towards projects within the local area and then within the wider area.

Included files

Title Climate Change and Sustainability

ID EGS8691

Person ID 1266699

Full Name Ms Carleen Bircham

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment

I am writing in relation to the massive development of Dacorum housing currently in consultation, which I - and most people I have recently spoken to - have only just heard about, and which is only in consultation until this coming Sunday. I was unaware of the booklet that was supposed to come through residents doors.

Whilst I support the need to increase housing, this needs to be done in a sustainable way and to preserve the greenbelt. The plans to increase housing in the area by 16,600 new homes is completely excessive to what the projected need is. The latest ONS data available projects 6051 new homes by 2038 - 64% fewer than this plan projects. I therefore object to the proposed plans and would like this email put forward to the decisions board.

There is already a high demand for services such as traffic needs, schools and healthcare in the Dacorum area. The plan does not commit to any level of sustainability in its sustainability targets.

A booklet through some doors and info on the website is not sufficient to inform all residents of Dacorum, especially during these times and urgently needs reconsideration.

Included files

Title Climate Change and Sustainability

ID EGS8701

Person ID 1266709

Full Name Ms Jo Waller

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment 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.

Included files

Title Climate Change and Sustainability

ID EGS8797

Person ID 1261814

Full Name Liz Uttley

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Climate Change and Sustainability comment	DM22 & DM23 There is much positive in these policies, I am pleased to see for example, community heating and renewable energy and carbon offsetting in this Plan. However, I believe that the starting point for any genuine attempt to reach net carbon zero by 2050 must be proper measurement of the carbon impacts of any development. This includes carbon sequestration value of lost green land, carbon costs of building (materials, transport etc), carbon cost of use (heating, electricity), carbon cost of location (is it a car dependent development, and carbon cost of eventual dismantling/recycling).
Included files	
Title	Climate Change and Sustainability
ID	EGS8812
Person ID	1158356
Full Name	Colin Blundel
Organisation Details	Planning Officer Chiltern Society
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Climate Change and Sustainability comment	Policy SP10 - Climate Change Mitigation and Adaptation – The Chiltern Society supports the proposals for climate change mitigation and adaptation. To meet the 2030 target there will need to be a step change in the way new developments address climate change. Habitat improvements should not be restricted to tree planting schemes and should involve the creation and restoration of a range of different habitats, concentrating on those that are typical of the local area and suitable for local soils. Proposals should link closely with requirements for biodiversity net gain from developments and, where possible, with other more strategic initiatives in the local area such as Nature Recovery Networks and the Environmental Land Management Scheme (ELMS). Within the Chilterns, this should link to the actions set out in the Chilterns AONB Management Plan (Chilterns Conservation Board) and the Chiltern Society’s Manifesto for Chilterns Wildlife. The emphasis should be on on-site mitigation, but there is also scope for a carbon off-set fund as referred to in the policy.

Policy DM25 - Stand-alone renewable or low carbon energy - The Society is concerned over potential landscape and visual impacts on the Chilterns AONB. As a general rule, any installations should be located adjacent to existing clusters of buildings and should be located below the skyline wherever possible. There needs to be more emphasis on the devastating effect large wind turbines and solar farms have on the landscape and especially on the CAONB.

Policy DM26 - Carbon Offsetting - Any carbon offsetting that involves tree planting or habitat creation needs to be co-ordinated across the Borough to prioritise the type of habitats required through a Nature Recovery Network, Local Nature Recovery Strategy or the Hertfordshire Biodiversity Action Plan. We need considerable swathes of tree planting/habitat creation and not just 'token corridors'.

Included files

Title Climate Change and Sustainability

ID EGS8958

Person ID 222676

Full Name Mrs Carolyn Hill

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Climate Change and Sustainability comment I object to all of the proposed developments in Berkhamsted which will damage the historic character of this market town. Section 17 - In particular, Bk01 highlights the way in which the agreed 2013 Core strategy has been without any rationale disregarded. The BRAG group has responded in full regarding the environmental unsuitability of this location on the ridgetop and the lack of practical connectivity with the town centre which will simply overload congestion in the town as very few families with young children will walk up such a steep hill with push chairs. An evidence-based carbon reduction plan is also required to meet the national climate obligations of net zero by 2050. Increasing traffic movements along the linear, narrow valley floor to the ridge top is ridiculous and will increase carbon emissions substantially, not reduce them.

Included files

Title Climate Change and Sustainability

ID EGS8964

Person ID	1266893
Full Name	PENNY HARRISON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>To whom it may concern.</p> <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>
Included files	
Title	Climate Change and Sustainability
ID	EGS8966
Person ID	1266893
Full Name	PENNY HARRISON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>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</p>

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.

Included files

Title Climate Change and Sustainability

ID EGS8968

Person ID 1266893

Full Name PENNY HARRISON

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment

- Dacorum to implement a local plan that includes firm and ambitious sustainable commitments. All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

Included files

Title Climate Change and Sustainability

ID EGS9026

Person ID 1267011

Full Name Mr Louis Quail

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Global Warming</p> <p>How can it be legal or sensible to swamp our green fields with concrete at the same time we are committing to reduce carbon commissions to zero by 2050 .</p> <p>On one hand we have Boris teaming up with David Attenborough talking to the world about the need to act on global warming , with the other he wants developers to have the power to build on green belt . This kind of greenwashing double standards will not stand and the council must resist on behalf of all of us.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS9039
Person ID	1264335
Full Name	Laura Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The building of thousands of new houses will overwhelm local services, increase congestion, and decrease air quality. Your plans ignore the increasing threat of climate change and sustainability. These issues are really important to me

and my friends but not apparently to you. It's as if you have been living in a time warp and your plans were written 20 years ago.

Included files

Title Climate Change and Sustainability

ID EGS9078

Person ID 1267066

Full Name Joanne Freedman

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Climate Change and Sustainability comment 4) Climate change and bio-diversity. Building on this scale, and the destruction of natural environments on this scale will cause further environmental harm, threaten the survival of a large number of species, and have many subsequent impacts on the ecology of the country. Our green spaces promote health and wellbeing at virtually no cost, removing these makes day to day living more expensive, more stressful and less healthy. I particularly enjoy the presence of wild birds of prey, and watching cygnets and ducklings growing to maturity on the canal; I am saddened to think that by putting 4,472 more cars onto the roads (average of 2 per household) on a town that is only 1055 acres (per Wikipedia) that the added pollution will destroy this.

The cliché phrase is "using a sledgehammer to crack a walnut". In this case, the requirement is more akin to a coconut. Possibly a pumpkin or an extremely large, mutant melon. But it still does not require a sledgehammer.

Included files

Title Climate Change and Sustainability

ID EGS9084

Person ID 1146072

Full Name Helen Cole

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	We know we are facing a climate crisis, in the UK we have committed to net zero by 2030, and yet there is nothing that I can see in this plan that says that all new housing must meet standards to support this. As a minimum we must have infrastructure to support our climate change goals. Houses must be built to the highest 'green standards' we must have a commitment that no natural gas supplies are provided to these homes, that each has a heat pump and solar panels. Every home should have an electric charging point. This should all be explicitly described in the plan.
Included files	
Title	Climate Change and Sustainability
ID	EGS9101
Person ID	1267074
Full Name	Joanne Howe
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS9115
Person ID	1267080
Full Name	Louise Shenton

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Rather than as an afterthought, sustainability should be at the absolute core of the proposed future developments in the Local Plan, as recommended by national planning guidance. This draft Local Plan fails to demonstrate a pathway to local zero carbon or enhancements to biodiversity. The plan is unambitious and does not commit to any level of sustainability in its sustainability targets. The proposed plan has clearly prioritised house building growth over considerations for the climate emergency. Several local authorities in England (e.g., Greater Cambridge, Reading and Liverpool City) have developed integrated local plans that take account of climate change, biodiversity, well-being and social inclusion. Beyond some fine words, there is no evidence in the proposed Local Plan of a viable action plan to deliver such an approach.</p> <p>We must ensure the Local Plan commits to all new homes to be certified zero carbon and sustainable in order to address the climate emergency.</p> <p>I call for:</p> <ul style="list-style-type: none"> • 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 Climate Change and Sustainability

ID EGS9155

Person ID 211352

Full Name Mr Andrew Sanderson

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Yes I have comments</p> <p>It is not enough for DBC to call a climate emergency and then develop a housing growth plan that locates developments in remote unsustainable locations that will by definition work against the worthy aims of the Climate Emergency initiative.</p> <p>It is also true that a single large-scale development or new town in one area offers the opportunity for infrastructure investment such as district heating, renewable energy and carbon neutral transport modes etc. that smaller developments cannot. BRAG accepts that the Garden Communities of north Hemel, HH01 and HH02 has that scale. In contrast, the proposals for South Berkhamsted and the other ridge-top Green Belt sites on the southern perimeter of the town will remove bio-diversity, and introduce non porous surfaces and pollution to a densely populated, high traffic area. In short, these sites can only contribute to the effects of climate change, regardless of policy statements.</p> <p>The Green Belt land between Berkhamsted and the A41 had previously been designated as an important ‘Green Lung’ for the town. That designation has clearly been dropped completely. In truth, if DBC had wanted to be bold and display a real commitment to the ‘Climate Emergency’ the plan could have highlighted how the health of those ‘Green Lungs’ could be improved by potentially using the land to expand historic woodland along with other bio-diversity improvements, rather than losing productive land in the chase for ‘targets’ that don’t exist.</p> <p>As CPRE has said, “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.....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, wellbeing and social inclusion. There is no evidence in the proposed local plan of such an approach.”</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS9207

Person ID	1267203
Full Name	Ms Eileen Martin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Question 3: Do you have specific comments about any of the Guiding Development policies?</p> <p>Yes The Plan misses important environmental considerations.</p> <p>We need to conserve Green Belt land that will absorb carbon through its soil and vegetation if we are to meet carbon reduction targets.</p> <p>Out of town developments create car dependent communities. This seriously damages the 2050 Net Zero target.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS9236
Person ID	1264686
Full Name	Suzanne Doubleday
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS9258
Person ID	1267329
Full Name	MARTIN DAVIES
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<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>
Included files	
Title	Climate Change and Sustainability
ID	EGS9289
Person ID	1267333
Full Name	JO MURPHY
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS9307
Person ID	1267332
Full Name	Nandi Jordan
Organisation Details	Chair Berkhamsted and Tring Labour Party
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map.</p> <p>We welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see our response to Environmental Sustainability in question 1.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS9360
Person ID	1267367

Full Name	Sarah Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<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>
Included files	
Title	Climate Change and Sustainability
ID	EGS9374
Person ID	1267368
Full Name	Peter Leighton-Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<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>

— 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.

Included files

Title Climate Change and Sustainability

ID EGS9388

Person ID 1267370

Full Name Patricia Beloe

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

— 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.

Included files

Title Climate Change and Sustainability

ID EGS9414

Person ID 1267392

Full Name TANYA VERBEEK

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS9424
Person ID	1267395
Full Name	SIMON WEBB
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Thank you for sharing your plan with us. My main points are: In favour: Building mixed developments with affordable housing that use heat exchangers / pumps and solar power as a compulsory feature with electric car charging points.
Included files	
Title	Climate Change and Sustainability
ID	EGS9435

Person ID	1267398
Full Name	Alexandra and James Donaldson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<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>
Included files	
Title	Climate Change and Sustainability
ID	EGS9498
Person ID	1267419
Full Name	Eric White
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	In terms of Climate Change and sustainability, the proposal has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

Included files	
Title	Climate Change and Sustainability
ID	EGS9530
Person ID	1267427
Full Name	Megan Humphreys
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	There is very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS9550
Person ID	1267433
Full Name	John McDonough
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<ol style="list-style-type: none"> 1 A quick watch of a David Attenborough highlights the importance of wildlife and protecting ecology. Climate change is a real issue and destroying wildlife and habitat in Northchurch is making the issue worse, not better. 2 There is increasing research which highlights the importance of nature in protecting people's mental health and wellbeing. The plans adversely affect this.

Included files	
Title	Climate Change and Sustainability
ID	EGS9562
Person ID	1264246
Full Name	Steve Burdekin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>The UK and the world is in a climate crisis. Building large properties on green belt land where the car is essential is a regressive and out dated policy. It is our responsibility to protect tomorrow for future generation. It is not our responsibility to caress the developers palms to keep their shareholders happy. There are much more sustainable ways and sites to build new housing.</p> <p>If we are going to tackle this climate crisis, massive considerations need to made, not token gestures that have no impact. Many of the people making these decisions, as with myself will not be around to see the disastrous consequences of 'our' actions. It takes bold and caring leaders to challenge these sorts of plans and act in the interests of those who will suffer.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS9622
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Climate Change and Sustainability comment	(17) <u>Climate Change and sustainability</u> – I support CPRE Herts published concerns on this matter.
Included files	
Title	Climate Change and Sustainability
ID	EGS9636
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS9677
Person ID	1267468
Full Name	Chris Berry
Organisation Details	CPRE Hertfordshire
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>In Chapter 17, mitigation and adapting to climate change is not sufficiently central to the Emerging Strategy vision and objectives. There is no mention of the requirement for all sectors to reach net zero by 2050, including those overseen by local authorities.</p> <p>Fig 6 is called 'Opportunities for Renewable Energy', but worryingly shows large swathes of countryside as 'opportunity for wind turbines'. This notation, Policy DM25 'a', and the information they are based on, must be reviewed to ensure that no encouragement is given to siting of turbines in locations that would result in harm to the designated landscapes and their settings, which includes views from such landscapes. The policy would seem to be far too permissive, and part 'c' is of the policy is worded to allow such development affecting designated areas subject to 'minimising' harm, not avoiding harm, which is what the policy should focus on. The same consideration should apply to part 'e' in respect of wildlife habitats.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS9691
Person ID	1267471
Full Name	Richard Evans
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>Failure to address climate emergency issues</p> <p>CPRE believes 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</p>

'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.

Included files

Title Climate Change and Sustainability

ID EGS9692

Person ID 1267472

Full Name Debbie Hawkins

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

Failure to address climate emergency issues

CPRE believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. Dacorum Borough Council declared a climate emergency more than a year ago. Despite this and some well-intentioned promises, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various UK bodies on how carbon reduction plans have to be integral to the development of local plans. Words of 'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.

Included files

Title Climate Change and Sustainability

ID EGS9704

Person ID 1267479

Full Name	Roger Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>Rather than as an afterthought, sustainability should be at the absolute core of the proposed future developments in the Local Plan, as recommended by national planning guidance. This draft Local Plan fails to demonstrate a pathway to local zero carbon or enhancements to biodiversity. The plan is unambitious and does not commit to any level of sustainability in its sustainability targets. The proposed plan has clearly prioritised house building growth over considerations for the climate emergency. Several local authorities in England (e.g., Greater Cambridge, Reading and Liverpool City) have developed integrated local plans that take account of climate change, biodiversity, well-being and social inclusion. Beyond some fine words, there is no evidence in the proposed Local Plan of a viable action plan to deliver such an approach.</p> <p>We must ensure the Local Plan commits to all new homes to be certified zero carbon and sustainable in order to address the climate emergency.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS9706
Person ID	1267479
Full Name	Roger Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Climate Change and Sustainability comment	<ul style="list-style-type: none"> Dacorum to implement a local plan that includes firm and ambitious sustainable commitments. All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.
Included files	
Title	Climate Change and Sustainability
ID	EGS9720
Person ID	1267480
Full Name	Paul Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS9770
Person ID	1267525
Full Name	Anil Mistry
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>1 Climate Change legal targets</p> <p>The UK government signed up to legal targets for the reduction of emissions, and has committed to net-zero emissions by 2050. These legal targets are likely to be revised upwards to be more ambitious as part of the COP26 climate conference to be held in Glasgow in November this year (postponed from 2020 due to the COVID-19 pandemic). DBC declared a climate emergency in the summer of 2019, but has yet to set out in detail how the borough will contribute to the government's legal targets. In other counties, legal challenges are being mounted to highlight how large-scale housing targets using greenfield sites are in breach of the climate change law.</p> <p>To avoid the same happening here, plans for net-zero to meet DBC's declaration of a climate emergency must feature bold and centre within the revised Local Plan, rather than climate change and biodiversity being shown to be negatively impacted by the plans in a side note (e.g. page NTS6 of Dacorum Local Plan Emerging Strategy for Growth Interim Sustainability Appraisal Report Non-Technical Summary). DBC is a member of the Hertfordshire Climate Change and Sustainability Partnership, and must step up efforts to contribute to and take account of the Carbon, Biodiversity, Transport and Water Sustainability Action Plans. These plans must take into account the carbon that is currently locked up within greenfield sites, that would be released if they are developed.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS9786
Person ID	1267530
Full Name	Susan Lambiase
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Climate Change and Sustainability comment	<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"> - 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	Climate Change and Sustainability
ID	EGS9926
Person ID	1267776
Full Name	Will Garbutt
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<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 & Northchurch area. My reasons are:-</p>

1. The overall amount of houses across the borough is disproportionate to current population growth figures.
 - 1 No thought to the impact on the impact on congestion of roads which are small and largely already in a very bad state.
 - 2 This is greenbelt land and needs to be conserved for delicate ecosystems of wild animals, insects, plants and trees.
 - 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.
 - 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.

Included files

Title Climate Change and Sustainability

ID EGS9929

Person ID 1267774

Full Name AATMA SEESURRUN

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

Included files

Title Climate Change and Sustainability

ID EGS9998

Person ID 1267854

Full Name MARTINA HALLEGGER

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	In terms of Climate Change and sustainability, the proposal has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS10023
Person ID	1267862
Full Name	ALEX CHAPLIN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Climate Change and Sustainability

ID	EGS10052
Person ID	1155402
Full Name	Christopher Stafford
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS10118
Person ID	1146091
Full Name	Mr John Foster
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	<p>Q #3 Do you have any specific comments about the guiding policies?</p> <p>A#3: 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>
Included files	
Title	Climate Change and Sustainability
ID	EGS10203
Person ID	1059789
Full Name	Mrs Alison Somek
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>I believe the focus of the plan is wrong, and that climate change and sustainability have not been considered adequately, or with sufficient intelligence</p> <p>I am fundamentally concerned about climate change and the "green agenda". How can it be right to carve up huge swathes of green belt land in the current climate. It cannot. I totally oppose the use of green belt land for building, on the scale that you are proposing.</p>
Included files	
Title	Climate Change and Sustainability

ID	EGS10227
Person ID	1268167
Full Name	CHRIS YOUDELL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS10237
Person ID	1268174
Full Name	ELIZABETH ROLLINSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Climate emergency issues have not been addressed:</p> <p>The planetary emergency of climate change & biodiversity loss, together with well-being, are of paramount importance and must 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</p>

carbon reduction plans have to be a key, integral part of the development of local plans. Some areas of Dacorum are part of the Chilterns AONB and this should be respected and integrated into any plans.

1 Failure to address climate emergency issues

CPRE believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. Dacorum Borough Council declared a climate emergency more than a year ago. Despite this and some well-intentioned promises, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various UK bodies on how carbon reduction plans have to be integral to the development of local plans. Words of 'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.

Included files

Title Climate Change and Sustainability

ID EGS10242

Person ID 1268177

Full Name DAVID ROLLINSON

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Climate Change and Sustainability comment

Climate emergency issues have not been addressed:

The planetary emergency of climate change & biodiversity loss, together with well-being, are of paramount importance and must 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. Some areas of Dacorum are part of the Chilterns AONB and this should be respected and integrated into any plans.

1 Failure to address climate emergency issues

CPRE believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. Dacorum Borough Council declared a climate emergency more than a year ago. Despite this and some well-intentioned promises, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various UK bodies on how carbon reduction plans have to be integral to the development of local plans. Words of 'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.

Included files

Title Climate Change and Sustainability

ID EGS10341

Person ID 1268418

Full Name JOSEPHINE O'NEILL

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Climate Change and Sustainability comment Environment
 The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council.

Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.

Included files

Title Climate Change and Sustainability

ID EGS10403

Person ID 1268432

Full Name SARAH STUBBS

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

Included files

Title Climate Change and Sustainability

ID EGS10417

Person ID 1268436

Full Name LUKE PICKETT

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment	If we are really serious about combatting climate change, and building a positive world for future generations, then nothing I've said here should be taken lightly. We need green belt land, trees, plants, wildlife. They provide us with oxygen, keep our vital ecosystem thriving, and prevent us from needing to build the next Noah's ark. You may think this is all a bit excessive, but at some point we have to start taking this all seriously, or there will be nothing left to save. Time is running out. Yes, build affordable housing, but do it smart. We can't just keep building forever, we only have so much land. And we need to be using more of it as natural spaces.
Included files	
Title	Climate Change and Sustainability
ID	EGS10422
Person ID	1268438
Full Name	LINDA GUNARY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	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
Included files	
Title	Climate Change and Sustainability
ID	EGS10448
Person ID	1263196
Full Name	Alizon Henderson
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	We are in a Climate Emergency – I see no use of 0 carbon heating/solar panels etc – more of this would be a disaster
Included files	
Title	Climate Change and Sustainability
ID	EGS10456
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Dacorum Council has declared a Climate Emergency to be net zero by 2030. We are calling for all new buildings to be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions) (See 3 above for more detail). The Local Plan has some fine aspirations, but we need to see firm commitments which are mandatory for every developer to follow.
Included files	
Title	Climate Change and Sustainability
ID	EGS10530
Person ID	1268615
Full Name	LOUISE ABSLOM
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Net carbon neutrality is an essential target and new developments present an ideal opportunity to meet the highest standards. We note DBC policy of 2020 is to be zero carbon by 2030. The Plan makes several references to ‘exemplar’ development but falls short of explicitly defining standards for energy efficiency (through building standards) and the inclusion of extensive local energy capture (e.g., via solar) etc. The Plan does not set the bar high enough with respect to these at present.
Included files	
Title	Climate Change and Sustainability
ID	EGS10557
Person ID	1268702
Full Name	Kirstin Chaplin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Do you have any specific comments about the guiding policies? — 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS10589
Person ID	1268723

Full Name	MARGARET HAWKINS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Failure to address climate emergency issues</p> <p>CPRE believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. Dacorum Borough Council declared a climate emergency more than a year ago. Despite this and some well-intentioned promises, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various UK bodies on how carbon reduction plans have to be integral to the development of local plans. Words of 'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS10638
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair Dacorum Environmental Forum Waste Group
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No

Climate Change and Sustainability comment

Comments appertaining to Carbon reductions, emission reductions etc

All references to low carbon or carbon emission reductions are aspirational and vague, with no concrete commitments or specific proposals , except:

17.1 The declaration also places key responsibilities on the Local Plan to include all available measures to cut carbon emissions and reduce the impact on the environment.

We note and commend the use of “all available measures”.

The UK Green Building Council says that around 10% of the UK’s carbon dioxide emissions are directly associated with construction. This includes the CO2 generated through the entire building process of Extraction, Manufacturing (including the energy to manufacture capital equipment, heating and lighting of factories), Transportation, Construction, Maintenance and Disposal. While the Policy DM22 “Emerging Strategy For Growth”, and “Sustainable Design and

Construction and Policy” and Policy DM23 – “Energy and Carbon Emissions

Reductions in New Development” all seek to “mitigate” the climate implications of the massive levels of construction it proposes, DEF strongly suggests that it should at the same time “seek to” revise the volume of construction downwards, since CO2 emissions are directly proportional to the housing numbers.

“17.12 We are preparing a Climate Change Strategy and Action Plan to help meet our pledge for the impact of our services and assets to be carbon neutral by 2030 and also to contribute towards the whole UK targets. The Action Plan looks at how services throughout the Council can support our ambition and identifies the Plan as key to achieving change across the whole of the Borough.”

Without this action plan the local plan will be incomplete and should not be adopted until the action plan has been included in the consultation.

“Policy SP10 up until 2030, all new development will be required to accord with Policy DM23 - Energy and Carbon Emissions Reductions in New Development; and from 2030 onwards, all new development will be net zero.”

Net zero is achievable without additional technical innovation, so net zero should be set as a requirement for all new builds after the date of the adoption of the Local Plan.

The strategies outlined in this policy are to be supported, but we re-emphasize that they appear to be aspirational, rather than meeting quantifiable targets. When the policy states “requiring.....” there is no quantifiable target that should be achieved. Given that a variety of strategies have been proposed, there is no strategy for assessing relative contributions of each.

More specifically, for approval any development plan should be accompanied by an explanation of how it will achieve a net carbon gain over its lifecycle, taking into account the loss of existing natural CO2 absorbers, the embodied energy of the

construction materials used and ongoing emissions due to the heating, maintenance etc. of the properties in the development.

“1 All development is required to mitigate and adapt to climate change and to actively pursue the reduction of carbon dioxide emissions.”

It should be pointed out that this highlights a fundamental misunderstanding in the Plan, as no development can ever reduce carbon dioxide emissions in an absolute sense. To do so would require the old properties vacated by the new occupants of the development (either residents or businesses) to be demolished, or retrofitted with highly effective carbon reducing technologies.

“To be produced:

Detailed Design Guide SPD

Climate Change Strategy and Action Plan”

Until these documents are produced and made available for public comment, the NLP should be considered incomplete.

“17.19 Proposals should be designed to enable future retrofitting to meet higher energy efficiency standards and lower GHG emissions by connecting to an air source heat pump, community heat networks or other low or zero carbon sources.”

Why enable retrofitting? The technology exists to implement these technologies now, and should be a requirement built into planning consent.

“17.24 While the Government has signalled its intent to introduce a 'roadmap' to reducing greenhouse gas emissions to net-zero by 2050 - to include the Future Homes Standard in 2020 and further measures from 2025 for new homes to produce 75-80% lower CO2 emissions and be 'zero carbon ready' - our Plan accelerates this change. Our initial energy efficiency standards for new residential development are set at exceeding the Building Regulations Part L 2013 by a further 19% in terms of CO2 reductions on the Target Emission Rate (TER). This is the equivalent of the withdrawn Code for Sustainable Homes Level 4and complies with the provisions of the Planning and Energy Act 2008. In addition we will seek contributions towards a further 20% reduction, leading to all new development being carbon neutral from 2030”.

In view of the severity of the climate emergency, developments should comply with the withdrawn code 6, and be carbon neutral much sooner than 2030. As commented elsewhere, the technology for this already exists, and bearing in mind the energy costs saving to the consumer, will be a price that the consumer will be prepared to pay.

“Policy DM22 3C. Incorporate green infrastructure to sequester carbon, to include two or more new trees (a tree shall be considered to count if it ordinarily reaches a mature height of 6 metres or more) per dwelling or per 100 sq m floor space (for non-residential developments) on-site.”

We note and approve this quantifiable target in the policy.

“Policy DM23 – “Energy and Carbon Emissions Reductions in New Development

- 1 For all new major residential development, an energy performance standard equivalent to at least 19% carbon emissions reduction on the Dwelling Emission Rate (DER) against the Target Emission Rate (TER) based on Part L of the Building Regulations (2013) whilst meeting the Target Emission Rate (TER) solely from energy efficiency measures as defined within the SAP calculation model.”

Notwithstanding our comments in the previous sections, these are laudable quantifiable targets.

“ii. contribute to a further 20% reduction in residual carbon emissions through the provision of on-site renewable energy generation, or provision and connection to decentralised low carbon energy sources.”

To be viable, decentralised low carbon energy sources need to be grid connected, thus giving consumers, a choice as to which energy supplier to use. DBC does not have the power to do so, making this an undeliverable promise.

“2. In meeting these requirements developments are expected to: be developed in accordance with the sequencing of the energy hierarchy set out in Figure 5(i.e. design, fabric first approach and energy efficiency measures before considering decentralised renewable or low carbon energy sources”

Given the severity of the climate emergency, developers must consider both fabric and energy efficient measures as an alternative to renewable or low carbon energy sources with equal priority

“To be produced:
Climate Change and Sustainability SPD”

Until this document is produced and made available for public comment, the consultation should be considered incomplete.

Included files	
Title	Climate Change and Sustainability
ID	EGS10678
Person ID	1161079
Full Name	Melanie Llewellyn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	It is not enough for DBC to call a climate emergency and then develop a housing growth plan that locates developments in remote unsustainable locations that will by definition work against the worthy aims of the Climate Emergency initiative. It is also true that a single large-scale development or new town in one area offers the opportunity for infrastructure investment such as district heating, renewable energy and carbon neutral transport modes etc. that smaller developments cannot. BRAG accepts that the Garden Communities of north Hemel, HH01 and HH02 has that scale. In contrast, the proposals for South Berkhamsted and the other ridge-top Green Belt sites on the southern perimeter of the town will

remove bio-diversity, and introduce non porous surfaces and pollution to a densely populated, high traffic area. In short, these sites can only contribute to the effects of climate change, regardless of policy statements.

The Green Belt land between Berkhamsted and the A41 had previously been designated as an important ‘Green Lung’ for the town. That designation has clearly been dropped completely. In truth, if DBC had wanted to be bold and display a real commitment to the ‘Climate Emergency’ the plan could have highlighted how the health of those ‘Green Lungs’ could be improved by potentially using the land to expand historic woodland along with other bio-diversity improvements, rather than losing productive land in the chase for ‘targets’ that don’t exist.

As CPRE has said, “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.....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, wellbeing and social inclusion. There is no evidence in the proposed local plan of such an approach.”

Included files	
Title	Climate Change and Sustainability
ID	EGS10723
Person ID	1145421
Full Name	Mrs Shirley White
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS10740
Person ID	1145586

Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.</p> <p>Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map.</p> <p>I welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see my response to Environmental Sustainability in question 1.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS10814
Person ID	1268768
Full Name	Amanda Stafford
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.</p> <p>(21)</p>

Included files	
Title	Climate Change and Sustainability
ID	EGS10866
Person ID	1152225
Full Name	GILLIAN JOHANSSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	1 Environmental – Whatever housing is needed, it is time that we moved away from traditional brick housing to environmentally friendly, modern building techniques, which can be done speedily with low carbon emissions.
Included files	
Title	Climate Change and Sustainability
ID	EGS10885
Person ID	1268804
Full Name	Mr Mark Dixon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Environmental Impact

The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council

Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.

Included files

Title Climate Change and Sustainability

ID EGS10899

Person ID 1268814

Full Name Ms Emma Cotton

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment

Environment

The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council

Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.

Included files

Title Climate Change and Sustainability

ID EGS10941

Person ID	1268880
Full Name	Ms Jo-anne Tunmer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	— 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS10942
Person ID	1268880
Full Name	Ms Jo-anne Tunmer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	— The housing proposed in Northchurch will attract two car families. As most of the development is at the top of steep hills, far from the train station or employment in Berkhamsted, it will necessitate car journeys for work, grocery shopping, schools and doctors' appointments. This is not sustainable and does not take account of the responsibility to address climate change.
Included files	
Title	Climate Change and Sustainability
ID	EGS10958

Person ID	1268886
Full Name	Mr Paul Jayson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS11016
Person ID	1268908
Full Name	Molly Berry
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>We have read with interest the Decorum local plan for many thousands of new homes in the Hemel Hempsted, Berkhamsted and Tring areas.</p> <p>As you are aware, we are in a climate and ecological emergency, and risk complete catastrophe, so this needs to be in the forefront of everyone's mind when thinking of and planning for new homes.</p> <p><u>We see this as a great opportunity for DBC to shine.</u> A chance to plan and deliver award winning ecologically sound developments, like the one in Norwich, which was built to German <i>Passivhaus</i> standards, a rigorous system that reduces</p>

a building's ecological footprint. The houses in that development are designed to be as airtight as possible, with a mechanical heat and ventilation system that circulates air through the rooms. Heating bills should be about £150 a year, wouldn't that be great for the DBC developments?

Included files

Title Climate Change and Sustainability

ID EGS11073

Person ID 1144903

Full Name Mr Brian Rook

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment The Local Government Association released a statement in Feb 2020:
We support the intention of the Government's proposals to future-proof new build homes with low carbon heating and world-leading levels of energy efficiency.
Yet there is no clear stipulation in the DBC draft plan to ensure housing is supplied by 'green' energy in order to meet climate change/carbon neutral obligations to which the government is committed.

Included files

Title Climate Change and Sustainability

ID EGS11085

Person ID 1268919

Full Name Dr Daniel Bishop

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>The Dacorum Local Plan (to 2038) does not sufficiently consider the government’s Ten Point Plan for a Green Industrial Revolution (Nov 2020), or the government’s Cycling and Walking Investment Strategy (April 2017) – and may consequently leave the council vulnerable to legal action.</p> <p>The current version of the plan does not adequately address four of its own objectives: ‘Mitigating and adapting to climate change’, ‘Conserving and protecting the natural environment’, ‘Promoting and facilitating sustainable transport and connectivity’ and ‘Supporting community health, wellbeing and cohesion’. If these points are not addressed, then the council may endure protracted legal proceedings.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS11136
Person ID	1268956
Full Name	Mr John Bell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The UK government signed up to legal targets for the reduction of emissions, and has committed to net-zero emissions by 2050. These legal targets are likely to be revised upwards to be more ambitious as part of the COP26 climate conference to be held in Glasgow in November this year (postponed from 2020 due to the COVID-19 pandemic). DBC declared a climate emergency in the summer of 2019, but has yet to set out in detail how the borough will contribute to the government’s legal targets. In other counties, legal challenges are being mounted to highlight how large-scale housing targets using greenfield sites are in breach of the climate change law.</p> <p>To avoid the same happening here, plans for net-zero to meet DBC’s declaration of a climate emergency must feature bold and centre within the revised Local Plan, rather than climate change and biodiversity being shown to be negatively</p>

impacted by the plans in a side note (e.g. page NTS6 of Dacorum Local Plan Emerging Strategy for Growth Interim Sustainability Appraisal Report Non- Technical Summary). DBC is a member of the Hertfordshire Climate Change and Sustainability Partnership, and must step up efforts to contribute to and take account of the Carbon, Biodiversity, Transport and Water Sustainability Action Plans. These plans must take into account the carbon that is currently locked up within greenfield sites, that would be released if they are developed.

I am proud to be the Secretary Transition Town Berkhamsted, linked to from the DBC website as a good starting point for constituents to get involved.

Included files

Title Climate Change and Sustainability

ID EGS11266

Person ID 221884

Full Name Ms Eliza Hermann

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment Policy DM25 Stand Alone Renewable or Low Carbon Energy needs to be rewritten to provide stronger protection for the Chilterns AONB and the Green Belt. It needs to make clear that visually intrusive or environmentally damaging development of wind turbines and / or solar farms will not be permitted. NPPF para. 147 is clear that "when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development." Figure 6 on page 107 (AECOM, 2010) suggests that wind turbines could be installed over about two-thirds of the land-mass of Dacorum: this is clearly inappropriate.

Included files

Title Climate Change and Sustainability

ID EGS11311

Person ID 1269000

Full Name	Mrs Tracey Franklin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Environment The plan should be taking into account the affects on the carbon footprint of the town and the subsequent impacts the development makes on the overall climate for people who actually live in the towns affected. As Dacorum council have committed to reducing carbon emissions across Council activities to net zero by 2030, this development will hinder any attempt to meet this goal as overpopulating small towns, does nothing to deplete carbon emissions.
Included files	
Title	Climate Change and Sustainability
ID	EGS11368
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	
Climate Change and Sustainability comment	Climate change and sustainability Along with Dacorum, Hertsmere declared climate emergency in September 2019. The council are encouraged by proposals within the Local Plan to tackle climate change and promote environmental sustainability, and support proposals for all development to be net zero from 2030 onwards. Where appropriate the Local Plan should consider the potential

for cross boundary initiatives including resource management, transport improvements, waste management, and health and well-being initiatives. This could include sharing best practice and/or liaising over the establishment of new processes addressing issues such as biodiversity net gain and carbon off-setting.

Included files

Title Climate Change and Sustainability

ID EGS11428

Person ID 1269025

Full Name JOHN MAWER

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* **Yes**

* **No**

Climate Change and Sustainability comment 1 **Climate change and sustainability**
Can developers be held to requirements?

Included files

Title Climate Change and Sustainability

ID EGS11444

Person ID 1264362

Full Name Juliet Miller

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* **Yes**

* **No**

Yes

Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.</p> <p>Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map.</p> <p>I welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see my response to Environmental Sustainability in question 1.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS11457
Person ID	1261429
Full Name	Douglas Fisher
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>The recent significant trend towards more working from home and its expected continuation has not been taken into account and should have been included with the other measures listed under item 3 of SP10.</p> <p>This should then have been reflected in SP4, SP5, DM1, DM6, DM17, DM22 and DM52.</p> <p>In particular, Policy DM1 requires a mix of very many specified housing types but home-working and live/work units have been wrongly omitted.</p>

Included files	
Title	Climate Change and Sustainability
ID	EGS11485
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The Climate Change Emergency should be at the core of the local plan. It seems to be headlined without much follow up. The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Change 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS11594
Person ID	1269148
Full Name	SIMON AND ANNA BARNARD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Climate Change and Sustainability comment	<p>Policy SP10 - Climate Change Mitigation and Adaptation – To meet the Council's 2030 target for climate change, there will need to be a complete change in the Council's approach to new developments. There is considerable value in maintaining Green Belt land free from development due to the harm that developing this land would do to the fight against Climate change. The Plan proposes so much development in the Green Belt that it is very unlikely that its target would be met, and further damage would be done. The effects of massive developments on the fringes of the towns will not be mitigated by a bit of tree planting or narrow wildlife corridors. Habitat improvements needs the creation and restoration of a range of different habitats, concentrating on those that are typical of the local area and suitable for local soils. The priorities of the Plan must be more green and not just more buildings and hard surfaces.</p> <p>Policy DM25 - Stand-alone renewable or low carbon energy – Whilst the use of wind turbines and solar panel farms is commendable in the need for renewable energy sources, the potential landscape and visual impacts on the Chilterns AONB would be devastating.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS11649
Person ID	1269150
Full Name	Mrs Helena Parr
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Any developers should be selected on their ability to demonstrate how they propose to minimise any environmental impact, reducing carbon emissions, improve the quality of life for residents.
Included files	
Title	Climate Change and Sustainability
ID	EGS11683

Person ID	1269212
Full Name	PETER SCOTT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability</p> <p>Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map.</p> <p>We welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see our response to Environmental Sustainability in question 1.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS11726
Person ID	1152494
Full Name	MRS G RUSSELL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	Re 17: Climate Change and Sustainability I didn't see any mention here of charging points for electric cars. These should be mandatory for all new builds from now on if climate change and sustainability are being taken seriously. People will still need cars, even if public transport is improved..
Included files	
Title	Climate Change and Sustainability
ID	EGS11813
Person ID	398725
Full Name	Mr Valter Johansson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	4. Environmental – Whatever housing is needed, it is time that we moved away from traditional brick housing to environmentally friendly, modern building techniques, which can be done speedily with low carbon emissions.
Included files	
Title	Climate Change and Sustainability
ID	EGS11873
Person ID	1269275
Full Name	KALLIOPI KOUTSOU
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS11946
Person ID	1150963
Full Name	SUE TAYLOR
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Green infrastructure such as hedgerows, meadows and woodland lock carbon onto the soil, removing any of the above will release stored carbon, while newly created areas will take decades to sequester a similar level of carbon.</p> <p>A carbon reduction plan must be integral and sustainable as set out in the National Planning Policy Framework and the 2004 Planning & Compulsory Purchase Act.</p> <p>This means ensuring that the local plan takes into account all the local and regional needs and does not merely prioritise economic growth through expansion of the urban footprint.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS11958
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 * No	Yes
Climate Change and Sustainability comment	17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS11986
Person ID	1269352
Full Name	Walid Youssef
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS12022
Person ID	1161359
Full Name	D B Land and Planning
Organisation Details	D B Land and Planning
Agent ID	1161362

Agent Name	Nathan McLoughlin
Agent Organisation	McLoughlin Planning
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Policy SP10 – Climate Change Mitigation and Adaptation DBLP support the broad aims of the policy in terms of the active reduction of carbon dioxide omissions. However, it is clear that Policy SP10 is to be accompanied by various Supplementary Planning documents/Action Plan providing climate change and sustainability as well as detailed design guidance. The concern here is that such an approach is contrary to that in the NPPG regarding Supplementary Planning documents. Further SPD’s may introduce additional planning policy constraints over and above what is within Policy SP10 itself. Of particular concern is Part 3 of the policy which sets out the Plan’s objectives to contribute to net zero carbon through mitigation measures. Under Part B of the policy, there is a measure identified that where: “Carbon emissions cannot be mitigated, collecting contributions to a carbon off-set fund”.</p> <p>At this stage, it is not clear what that Fund is and how that Fund will be operated with the objective of carbon off-setting. This has obvious concerns in terms of the applicability of such a Fund relative to the rules governing planning obligations and it also ignores any programme or commitment that a developer may have for carbon off- setting themselves in their day-to-day business operations. Without further detailed justification and/or appropriate evidence demonstrating how this fund will work, it is recommended that this requirement is deleted from the policy.</p> <p>Policy DM22 – Sustainable Design & Construction The concern with this policy is again the reliance on a Supplementary Planning document referred to in part 6 of the policy that requires all proposals to be in accordance with the Dacorum Climate and Sustainability SPD which will be produced separately. The purpose of this policy is as a Development Management policy to assist the Council in determining Planning Applications. It is considered to be sufficiently detailed and clear in terms of its requirements. Reliance on further SPD’s raises a question about the relevance of additional tests that an SPD could contain and the legitimacy of putting additional policy requirements in an SPD over and above the Local Plan policy.</p> <p>Policy DM24 and Figure 6 As drafted, the policy requires new developments to either provide a site-wide community energy network and/or connect to existing decentralised energy networks where this is available. The challenge with this policy is that it does not provide any guidance or instances where it is simply impractical or uneconomic to provide a site wide community network and then secondly, where it is physically not possible to connect to an existing decentralised network because there is not one in the vicinity of the site. At the very least, the policy should be redrafted to provide sufficient flexibility for Applicants for major development to provide evidence justifying why the creation of a site-wide community heat energy network would be unfeasible, economic or impractical to implement. An additional concern which need to be taken into account</p>

is whilst there may be instances where it could be achieved, there will be a need for it to be affordable to residents (both open market and affordable sectors).
 The benefit of this approach is that it would allow the developer to better demonstrate the sustainability credentials of proposed dwellings (taking a fabric first approach) and for the Council to better understand the wider energy demands arising from new development.

Included files	
Title	Climate Change and Sustainability
ID	EGS12130
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	
Climate Change and Sustainability comment	1 Climate Change & Sustainability Policies SP10 & DM22 to DM26 No objections
Included files	
Title	Climate Change and Sustainability
ID	EGS12161
Person ID	1269444
Full Name	Mr & Ms Jim & Katie Barnard & Partridge
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	— 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS12275
Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.
Included files	
Title	Climate Change and Sustainability
ID	EGS12327
Person ID	1269489
Full Name	STEVE HILL

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability 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	Climate Change and Sustainability
ID	EGS12437
Person ID	1146040
Full Name	Mrs Rachel Macdonald
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate Change and Sustainability The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions. All construction must be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map .
Included files	

Title	Climate Change and Sustainability
ID	EGS12489
Person ID	1269524
Full Name	DAVID ATKINSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.
Included files	
Title	Climate Change and Sustainability
ID	EGS12548
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	
Climate Change and Sustainability comment	Water supply in this area is constrained being supplied by the local aquifer which also feeds our Chalk Streams. The Environment Agency tells us that abstraction is to be restricted to 'current' levels. This poses a challenge to the

Infrastructure Plan and is a critical aspect of the proposal to increase dwelling numbers by over 20% in this locality. We comment further in Q6 Sustainability Appraisal.

Aside from 'climate change', with reduced rainfall, Residents will need assurance that the water supply is not threatened by the increased numbers.

We note **SP10 Climate Change Mitigation and Adaptation** applies primarily to new development. We are pleased that existing stock is not forgotten as policy 3.i applies viz:

The Plan makes references to the Borough's Climate Change Strategy: we commend its ambition as set out in Para 17.24 and 17.25 on non-residential development

This is set out in:

Policy DM23 - Energy and Carbon Emissions Reductions in New Development

We also note the several statements and Policies relating to Community Heat and Energy Networks. These are an improvement on previous policies and should be retained. Sadly they seem to have never found acceptance by developers in this Borough.

Included files

Title

Climate Change and Sustainability

ID

EGS12567

Person ID

1269554

Full Name

Ellen Satchwell

Organisation Details

Sustainable Development Lead Advisor - Thames Solent Team
Natural England

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

Climate change adaptation

We welcome consideration of Climate Change, as outlined in Section 17 of the Local Plan Emerging Strategy for Growth. *Policy SP10 – Climate Change Mitigation and Adaptation.*

The Local Plan should, in considering climate change adaptation, also recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

A list of useful links on consideration of climate change adaptation is provided at Annex B.

Annex B – Climate Change Adaptation

We have put together the following list of resources that can help to embed climate change adaptation into the Local Plan:

- The Climate Change Adaptation Manual provides extensive information on climate change adaptation for the natural environment. It includes the Landscape Scale Climate Change Assessment Method that can help people through an assessment of the impacts and vulnerabilities of their natural environment features and the adaptation the can plan. There are sections on habitats, species, green infrastructure, access and recreation and geology and geomorphology
- The Nature Networks Evidence Handbook – again, a repository for our current evidence, tools and action regarding nature networks, it contains practical suggestions for designing and delivering a network and there is a practitioners version
- A range of spatial data including - National Biodiversity Climate Change Vulnerability Assessment (NBCCVA), National Habitat Network, Species Risks and Opportunities climate envelope modelling, etc. These datasets are included in the Landscape Scale Climate Change Assessment Method in the Climate Change Adaptation Manual, the Data and Tools chapter in the Nature Networks Evidence Handbook and NRN toolkit list. Furthermore, the fragmentation metric of the NBCCVA tool provides the Biodiversity and Connectivity Tool within the Biodiversity Metric of Net Gain
- A range of introductory climate change webinars (Natural England Climate Change webinars) are available on our YouTube channel

The following are planning and climate change documents which looked at climate change, species responses, ecological networks and spatial planning:

- Climate Change and Biodiversity Adaptation: The Role of the Spatial Planning System (NECR004)
<http://publications.naturalengland.org.uk/publication/41006?category=10003>
- Making space for wildlife in a changing climate (NE263)
<http://publications.naturalengland.org.uk/publication/47002?category=10003>
- Spatial planning for biodiversity in our changing climate (ENRR677)
<http://publications.naturalengland.org.uk/publication/63010?category=10003>

Title	Climate Change and Sustainability
ID	EGS12588
Person ID	1269561
Full Name	Mr & Mrs Martin & Tracey Martin & Tracey Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<ul style="list-style-type: none"> 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.
Included files	
Title	Climate Change and Sustainability
ID	EGS12611
Person ID	1207604
Full Name	Thames Water Planning Policy
Organisation Details	C/O Savills Thames Water Planning Policy
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Policy DM22 relates to sustainable design and construction and requires development to minimise water use during construction (e.g. by specifying off-site modular construction or non-wet trades) and limit residential indoor water consumption to 110 litres per person per day. This policy is supported. However, it should be noted that if the application

of the 110 litres per person per day requirement is to be applied through the Building Regulations, that a planning condition will be required to ensure that the optional higher water efficiency standard is applied.

Included files

Title Climate Change and Sustainability

ID EGS12813

Person ID 1269634

Full Name Frank Worth

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment 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.

Included files

Title Climate Change and Sustainability

ID EGS12843

Person ID 1145801

Full Name Mr Guy Barlow

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment	Environment The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council.
Included files	
Title	Climate Change and Sustainability
ID	EGS12882
Person ID	1207443
Full Name	Mrs Jennifer Bissmire
Organisation Details	Clerk Markyate Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate Change and Sustainability Ref 17.16 and Ref 17.17 These policies are very important. While Markyate Parish Council is opposing new developments in our Parish, we support the principles involved in making the UK zero carbon. and will want to see where we can promote the reduction of the carbon footprints of existing properties in our Parish.
Included files	
Title	Climate Change and Sustainability
ID	EGS12991
Person ID	1269778
Full Name	STEPHEN BLADEN
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	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. Beyond some fine words, there is no evidence in the proposed Local Plan of a viable action plan to deliver such an approach.
Included files	
Title	Climate Change and Sustainability
ID	EGS13032
Person ID	1270011
Full Name	Mrs Nicola Davis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Dacorum declared a climate emergency in April 2019, and has committed to reducing carbon emissions across council activities to net zero by 2030. Developers should be chosen based on their priority to minimise their environmental impact and showing how they propose to protect the natural habitats and improve the quality of the overall environment of land, water and air, as well as contributing to biodiversity.
Included files	

Title	Climate Change and Sustainability
ID	EGS13051
Person ID	1270013
Full Name	Mr Daniel Ritchie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.</p> <p>Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map.</p> <p>I welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see my response to Environmental Sustainability in question 1.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13099
Person ID	1270037
Full Name	MRS GINA BARLOW
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Environment</p> <p>The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council.</p> <p>Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13115
Person ID	1264860
Full Name	Alan Coughtrey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Environment</p> <p>The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council</p> <p>Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.</p>
Included files	

Title	Climate Change and Sustainability
ID	EGS13131
Person ID	1270061
Full Name	Mrs Coughtrey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Environment</p> <p>The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council</p> <p>Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13217
Person ID	1270128
Full Name	Richard Salway
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Climate Change and Sustainability comment	<p>Climate Change and Sustainability</p> <p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.</p> <p>Dacorum declared a Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK Net zero housing – Project map – Good Homes Alliance.</p> <p>I welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see my response to Environmental Sustainability in question 1.</p> <p>(See extra 2 sheets of answers provided, starting 'Environment and Biodiversity')</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13229
Person ID	1270134
Full Name	Mrs Louise Bladen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<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. Beyond some fine words, there is no evidence in the proposed Local Plan of a viable action plan to deliver such an approach.</p>
Included files	
Title	Climate Change and Sustainability

ID	EGS13246
Person ID	1270143
Full Name	Mr Thomas Parsons
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.
Included files	
Title	Climate Change and Sustainability
ID	EGS13253
Person ID	1270147
Full Name	Ms Rhian Windridge
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Climate Change and Sustainability comment	<p>Rather than as an afterthought, sustainability should be at the absolute core of the proposed future developments in the Local Plan, as recommended by national planning guidance. This draft Local Plan fails to demonstrate a pathway to local zero carbon or enhancements to biodiversity. The plan is unambitious and does not commit to any level of sustainability in its sustainability targets. The proposed plan has clearly prioritised house building growth over considerations for the climate emergency. Several local authorities in England (e.g., Greater Cambridge, Reading and Liverpool City) have developed integrated local plans that take account of climate change, biodiversity, well-being and social inclusion. Beyond some fine words, there is no evidence in the proposed Local Plan of a viable action plan to deliver such an approach.</p> <p>We must ensure the Local Plan commits to all new homes to be certified zero carbon and sustainable in order to address the climate emergency.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13312
Person ID	1250019
Full Name	Cllr Nick Hollinghurst
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>The Climate Response section needs to provide for more all-electric vehicle facilities. In particular we need banks of rapid chargers at 3 locations: (1) Bourne End Sevices A41; (2) Maylamds Avenue Strategic Employment Area (3) close to BP Building/Hotel near M1 J8.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13328
Person ID	1270200
Full Name	Mr Richard Harman

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS13367
Person ID	924129
Full Name	Mrs Natalia McIntosh
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS13394
Person ID	1153922
Full Name	Roger Hyslop

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS13434
Person ID	1270263
Full Name	MRS SHARON O'SULLIVAN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Section 17 Climate Change and Sustainability</p> <p>With regard to Climate Change and Sustainability the new general policy (SP10) includes measures to reduce carbon dioxide emissions. One of these presumes in favour of developments that result in a shift of transport choices away from cars and trains in favour of walking and cycling. No account is taken of the advantages of home working in connection with a move away from car journeys etc. and the expected long term shift in this. Home working will help to support local services and enhance or maintain the vitality of rural communities.</p> <p>An economic study has noted a likely permanent shift towards home working and a resulting reduction in the flow of commuters into towns and cities by between 10% and 27% on pre-Covid levels. In Hemel Hempstead around 27% of jobs are expected to be carried out from home. This compares with an existing figure of just under 4.5% according to the Dacorum Settlement Profiles Paper. Wigginton currently has just under 12% which is typical of other Dacorum villages.</p>

The new Local Plan, while acknowledging the pandemic, does not appear to have a policy to deal with the planning consequences of the expected rise in home working. There has already been a general rise in outbuildings for home offices and extensions for this purpose. Whilst these would often be classified as Permitted Development some would be considered business use. Consent was fairly recently given to a 4 bedroom house in Wilstone with a single storey side extension classified as Class 81 (business use). This was possible as employment uses are permitted in Wilstone, Long Marston and Aldbury but not in Wigginton, Patten End, Flamstead or Chipperfield.

Included files

Title Climate Change and Sustainability

ID EGS13468

Person ID 1270266

Full Name VANDA EMERY

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment 4) Climate Change & Sustainability - This shouldn't be about what the council is doing to it's operations, this is about local planning. We don't 'want' a 'low carbon future' we 'NEED' a 'zero carbon' society as soon as possible if we are to have any hope of a 'future' in which we can thrive. As said above the Local Plan should mostly be about how we're going to change the existing build environment (e.g. retrofit existing buildings) to reach zero carbon rather than about new buildings. That said clearly all new building built under a local plan passed by a council that's declared a 'climate emergency' will need to be 'zero carbon', other wise it's just hypocrisy.

Included files

Title Climate Change and Sustainability

ID EGS13471

Person ID 1270266

Full Name VANDA EMERY

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>1) As we've clearly established that the objectives are right, and the strategy they shape is flawed, it is there for clear that the Delivery Strategies maybe a good plan, but to solve the wrong problem.</p> <p>2) The biggest flaw with the delivery strategies is that despite acknowledging the climate emergency they are still strategies framed and structured in the same way they have been for the last few decades. Accepting emergency means revising priorities and planning over different time scales. If Dacorum has to get to zero carbon by 2030 (As it's own declaration implies), then this is the only time frame that matters. Declaring a Emergency is accepting that circumstance mean everything has to be reconsidered, and urgently. Dacorum, like the rest of the UK, therefore needs to be reconsidering it's plans for 2020-2030 as a matter of urgency, rather than worry about what it's going to be doing post 2030.</p> <p>Evidence: https://www.greenhousethinktank.org/uploads/4/8/3/2/48324387/climate_emergency_plan_that_fucr_may20.pdf</p> <p>3) The biggest omission from the Delivery's strategies is that it is only about planning the construction of new buildings. What is desperately needed is a plan for how Dacorum is going to retrofit all it's current buildings (the majority of which are currently dependant on natural gas for heating) in line with government zero carbon strategy. The council and the government would be naive to think that everybody will just retrofit their own homes on the time frame required. They council will need to coordinate and plan how this massive retrofit program is going to work locally.</p> <p>4) Why do none of the delivery strategy maps include locations for renewable energy generation? The 'Hertfordshire Renewable and Low Carbon Energy Technical Study (July 2010)' shows there is significant onshore wind potential, but there doesn't appear to be any land allocated for the construction of wind turbines (again this seems to be a housing strategy not a sustainability strategy or local plan).</p> <p>5) There is no stipulating in the delivery of new buildings about the use of local materials, local contractors, a maximum size for any individual planning application under the local plan (lost of small construction project ensure more diversity of designers and local character not soleless estates).</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13486
Person ID	1270269

Full Name	WENDY CONIAN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The UK government signed up to legal targets for the reduction of emissions, and has committed to net-zero emissions by 2050. These legal targets are likely to be revised upwards to be more ambitious as part of the COP26 climate conference to be held in Glasgow in November this year (postponed from 2020 due to the COVID-19 pandemic). DBC declared a climate emergency in the summer of 2019, but has yet to set out in detail how the Borough will contribute to the government's legal targets. 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 other counties, legal challenges are being mounted to highlight how large-scale housing targets using greenfield sites are in breach of the climate change law.</p> <p>To avoid the same happening here, plans for net-zero to meet DBC's declaration of a climate emergency must feature front and centre within the revised Local Plan, rather than climate change and biodiversity being shown to be negatively impacted by the plans in a side note (e.g. page NTS6 of Dacorum Local Plan Emerging Strategy for Growth Interim Sustainability Appraisal Report Non-Technical Summary).</p> <p>DBC is a member of the Hertfordshire Climate Change and Sustainability Partnership, and must step up efforts to contribute to and take account of the Carbon, Biodiversity, Transport and Water Sustainability Action Plans. These plans must take into account the carbon that is currently locked up within greenfield sites, that would be released if they are developed.</p> <p>This Plan completely fails to address climate emergency issues or demonstrate a pathway to local carbon reductions. This is a requirement of the National Planning Policy Framework and the 2004 Planning and Compulsory Purchase Act. An evidence-based carbon reduction plan is also required to meet the national climate obligations of net zero by 2050. Local Plans should be developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. 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 for local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.</p> <p>The Plan as it stands would inflict unacceptable levels of environmental damage: the greenbelt is not just a "nice to have" or just a route for people to pass through. Important as these things are the greenbelt is also a thriving mature habitat</p>

for vegetation, animal life and water retention. Destroying this natural environment cannot be replaced by planting a few trees somewhere else. Natural habitats have evolved over centuries and cannot be manufactured anew elsewhere. The soils are a valuable source of water retention that prevents flooding down into the town but also allows the water to seep through the layers to replenish in part the aquifers upon which we rely for water.

Included files

Title Climate Change and Sustainability

ID EGS13547

Person ID 1260521

Full Name Steve Ritchie

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.

Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.

All construction must be carbon neutral from development to finished build. Please see some examples already in the UK: <https://goodhomes.org.uk/net-zero-map>.

I welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see my response to Environmental Sustainability in question 1.

Included files

Title Climate Change and Sustainability

ID EGS13577

Person ID 1227768

Full Name Ms Denise Young

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.
Included files	
Title	Climate Change and Sustainability
ID	EGS13587
Person ID	1270310
Full Name	Ms Eleanor Jelf
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate Change and Sustainability - Dacorum declared a Climate Emergency in April 2019 – the policies and plans for growth should represent net zero carbon emissions, and new construction should therefore aim to be carbon neutral from development to finished build.

Included files	
Title	Climate Change and Sustainability
ID	EGS13602
Person ID	1270314
Full Name	Ms Claire Mistry
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>The UK government signed up to legal targets for the reduction of emissions, and has committed to net-zero emissions by 2050. These legal targets are likely to be revised upwards to be more ambitious as part of the COP26 climate conference to be held in Glasgow in November this year (postponed from 2020 due to the COVID-19 pandemic). DBC declared a climate emergency in the summer of 2019, but has yet to set out in detail how the borough will contribute to the government's legal targets. In other counties, legal challenges are being mounted to highlight how large-scale housing targets using greenfield sites are in breach of the climate change law.</p> <p>To avoid the same happening here, plans for net-zero to meet DBC's declaration of a climate emergency must feature bold and centre within the revised Local Plan, rather than climate change and biodiversity being shown to be negatively impacted by the plans in a side note (e.g. page NTS6 of Dacorum Local Plan Emerging Strategy for Growth Interim Sustainability Appraisal Report Non-Technical Summary). DBC is a member of the Hertfordshire Climate Change and Sustainability Partnership, and must step up efforts to contribute to and take account of the Carbon, Biodiversity, Transport and Water Sustainability Action Plans. These plans must take into account the carbon that is currently locked up within greenfield sites, that would be released if they are developed.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13659
Person ID	1259288

Full Name	Maria de Farago Botella
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Below I analyse the chapters on Climate change and Sustainability as well as Environment and Biodiversity highlighting the points where I don't think the plan is strong enough.</p> <p>Climate change and sustainability Dacorum declared Climate Emergency in April 2019 and have committed to reducing carbon emissions across Council activities to net zero by 2030. Any new policies and plans for growth should be based on that declaration so Climate Change and Sustainability policies should not be a just guidance but a demand.</p> <p>New developments in this plan should aim to net zero carbon footprint for the whole lifecycle- from planning, design, building and operation. Hence, all developments awarded under this plan should be required to demonstrate that they can be completed within net zero carbon footprint and emissions; all appointed developers must be able to demonstrate that their businesses are carbon neutral, all materials used must be proven to be sustainable.</p> <p>New dwellings must be self-sufficient energy sub-ecosystems producing and consuming renewable energy or exclusively delivered renewable energy guaranteeing zero emissions. They must fitted with green, affordable and efficient central heating appliances, such as source air heating.</p> <p>New developments should guarantee an increase in natural habitats (rewilding), to be connected with current wild (natural habitats) and prioritise the conservation of current ones. Green infrastructures such as green walls, beehives, reed bed, green roof, hedgerow, and wildlife overpass...etc must be used. See below from European Environment Agency (EEA). https://www.eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure</p> <p>Green transport to be implemented to absorb movement of people in Dacorum and reduce emissions. I would like to provide the following ideas:</p> <ul style="list-style-type: none"> ○ Robust network of electric buses, ○ Incremental pedestrianisation of highstreets, ○ Promote cycling and network of electric bikes for people to move around. <p>The following documentation referred to in the plan should be provided before any development goes ahead as they are either in draft or not delivered yet:</p>

- Climate Change and Sustainability SPD,
- Detailed Design Guide SPD
- Climate Change Strategy and Action Plan
- Final version of Strategic Design Guide SPD- this specifies details and the criteria for the Sustainability Statements to guide developers- VERY IMPORTANT that SPD is scrutinised prior developers submissions!!

Comments to policies on Climate Change and Policies: Note in bold is what is stated in the policy and not bold my comments

- SP01 - Climate Change Mitigation and Adaptation: all new development in the Borough should be net zero by 2030.
 - Where carbon emissions cannot be mitigated, collecting contributions towards a carbon off-set fund. Why cannot be mitigated?. If it's a new development should be carbon neutral!
 - Increasing the area of habitats that fix and store carbon, including tree planting; protect natural vegetation in all instances and create re- wild areas proportionally such as X m2 re-wild/ Xm2 built up. Give back natural ecosystems to the community.
 - encouraging on-site renewable and low carbon energy sources on development sites, and stand-alone renewable energy or low carbon schemes; Only renewable energy with zero emissions should be implemented in the new developments.
 - requiring development to have high levels of thermal efficiency, including setting carbon emission targets where applicable; ensure 100% thermal efficiency in new developments.
 - requiring development to specify construction materials with low embodied carbon, and to minimise building construction waste, including reuse and recycling wherever possible; Construction materials with no embodied carbon, they should be zero carbon footprint materials.
 - encouraging the use of sustainable transport modes in all new development; electric car charges should be provided in all dwellings and new business, as well as creating cycle lanes.
- DM22- Design and construction
 - Select only green developers- scrutinized and selected according to how green their business, practices, materials, energy feed are and that should be a priority.
 - Demand and prioritise for selection the submission of a Sustainability Statement with their application to demonstrate how the development minimises impact and contributes to the objectives set out in Policy SP10 - Climate Change Mitigation and Adaptation (pg. 104, 17.21).
 - Define with values what materials with low embodied carbon is.
 - Ensure that there is a number of mature trees planted/dwelling and a green space/forest per number of dwellings.
 - Demand always the use of recyclable materials = 0 waste when possible.
 - Energy for the house- demand heat pumps or any other carbon neutral sources.
 - Demand permeable ground surfaces, use of green roofs, green corridors (green infrastructure) and proposals for net-biodiversity gain and positive measures to support wildlife.

- Policy DM23- Energy and Carbon emissions in new developments:
 - Government 75-80% reduction in carbon emissions by 2025 and neutral by 2030- this demands to all plans in new development to be carbon neutral from the beginning.
 - Prioritise on-site renewable energy generation
 - Why carbon offsetting and not all carbon zero directly in a NEW development?.
 - Prioritise the provision of on-site renewable energy generation, or provision and connection to decentralised low carbon energy sources.
 - Ensure implement a recognised monitoring regime to assess the energy use, indoor air quality, and overheating risk for at least 10% or more of the proposed dwellings for the first five years of their occupancy, and ensure that the information recovered is provided to the applicable occupiers and to the planning authority.
 - Select new residential development that targets certification to the Home Quality Mark and Passivhaus design standards and non-residential development that targets certification beyond BREEAM Excellent. Please look at some examples of sustainable, net zero houses on <https://goodhomes.org.uk/net-zero-map>
 - Proposals should be designed to ensure retrofitting to meet higher energy efficiency standards in future such as heat pumps or other low or zero carbon sources
 - Favour Community Heat and Energy Networks
- Policy DM24 - Low Carbon Community Heat and Energy Networks
 - Create a site-wide community heat or energy network connect to an existing decentralised network
 - Create a social and community infrastructure provision
- Policy DM25 -Stand-alone Renewable or Low Carbon Energy- design and potential for renewable or low carbon energy schemes will be given in Dacorum Climate Change and Sustainability SPD.
 - any proposals within the Chilterns AONB or its setting are of an appropriate scale and do not adversely affect the natural beauty or purpose of the AONB
 - locally important wildlife sites (including ecological corridors) and features cannot not be adversely affected;
- Policy DM26- Carbon offset.
 - Why carbon offset if new development it should ensure carbon neutrality from the beginning.

Included files	EGS13659.jpg
Title	Climate Change and Sustainability
ID	EGS13679
Person ID	1207133
Full Name	Chilterns Conservation Board

Organisation Details	Chilterns Conservation Board
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>DM22 and DM23 Sustainable design, construction & emissions Object.</p> <p>While the CCB is strongly supportive of the principle, and most of the content, of both of these policies, we are concerned that either policy could be seen to give support for development proposals in the Chilterns AONB and its setting that introduce building forms and materials that are alien to the landscape on the (laudable) grounds that the design is highly eco-friendly. The CCB is strongly of the view that there will always be alternatives that use locally appropriate designs and materials which are as effective, or effective enough, in terms of meeting the objectives of these policies. In our view the policies should include a caveat to the effect that in the Chilterns AONB, and its setting, if there is a choice between an alien design solution and one that is appropriate to the local landscape, then the locally appropriate solution should always be favoured. We consider that the Chilterns Buildings Design Guide and our technical note on renewable energy should be referenced in the additional guidance section. CCB's officers would be willing to assist DBC with drafting appropriate wording.</p> <p>It is worth noting that this year's Chilterns Buildings Design Awards (run jointly with the Chiltern Society) are intended to include categories for sustainable and low carbon design, and both organisations intend to promote design solutions that we consider are most appropriate for the Chilterns AONB environment. Using local materials is often a very good starting point.</p> <p>DM24 and DM25 Community heat and energy and Renewable energy Object.</p> <p>The CCB is again strongly supportive of the principle of both of these policies, but we have serious concerns about some of the wording, including of the supporting text, and the current form of figure 6.</p> <p>Paragraph 17.36 states that figure 6 "identifies opportunities for renewable energy in the Borough's town centres and Maylands Business Park, and through large-scale greenfield development." Taken at face value, this suggests that it is the council's policy that any area marked in green on the map in figure 6 is suitable for "large-scale greenfield development" and specifically for "wind turbines". If this is the council's policy then CCB most strongly objects. We do not, however, believe that this is intended to be the council's policy, and consider that paragraph 17.36 and the map in figure 6 should be amended appropriately, and should show (a) the AONB boundary, and (b) the growth areas proposed in the local plan where community heat and energy networks would be appropriate.</p>

The CCB has published a position statement on renewable energy, and we commend that advice to you. It includes, for example, the scale of developments (including wind turbine installations) that CCB considers are definitely inappropriate in the AONB and its setting. We consider that these guidelines should be translated into the draft local plan, and would be willing to assist with development wording in support of this. The position statement should be referenced as supporting guidance to the policy.

DM26 Carbon offsetting
Comment.

If carbon offsetting schemes envisaged under clauses 2 and 3 of policy DM26 are intended to include support for the planting or restoration of trees, woodlands, hedgerows or other green infrastructure, then the CCB would be interested in exploring ways in which this might be coordinated with other aspirations for nature recovery, rewilding, etc in a strategic way across the Chilterns region (not just within the AONB), including in partnership with others. (See also our response to policy DM30.)

Included files

Title Climate Change and Sustainability

ID EGS13708

Person ID 1263002

Full Name Rhona Denness

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment

We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan. Currently it is not.

It is very important that the recognised Climate Emergency acts both as a driver and brake to the plans. This plan as it stands prioritises housing construction over the Climate Emergency.

The expectation that Tring will accommodate at least 2700 new homes is not sustainable. As above, the 55% increase in the size of Tring is by far the largest within the plan for Dacorum and is likely to impact greatly on wildlife and biodiversity by destruction of hedgerows and other habitats, wildlife corridors and by the increase in population, cars, and pollution.

Statements are made about planning for a low carbon future but insufficient detail is given on how it would be achieved. Part of the policy is '*encouraging on-site renewable and low carbon energy sources on development sites, and stand along renewable energy or low carbon schemes*' (Policy SP10, p100). In the climate emergency, encouragement is not sufficient and is likely to be largely ignored in deference to economics. There must be stringent requirements made of developers to use green technologies, and net zero carbon emissions. The Local Plan should have a commitment to all new homes being certified zero carbon and sustainable in order to address the climate emergency. The knowledge and technology to make good affordable zero carbon sustainable homes exists and the Local Plan should prioritise this.

There are admirable aspirations included within the plan about creating new spaces for nature conservation or Local Nature Reserves, however this should not be at the expense of losing widespread open countryside and land which contribute to the AONB and Green Belt land. This would completely defeat the purpose! The plan should be detailed about how protection and enhancement of habitats and green and blue infrastructure would be achieved.

Included files

Title Climate Change and Sustainability

ID EGS13759

Person ID 1270372

Full Name Janet Tuppen

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

Climate Change and Sustainability comment

15. Climate Change. DBC has declared a climate emergency, and this is discussed at length in the Climate Change and Sustainability Topic Paper. There is no evidence that this has been integrated into the Local Plan. As described in the Climate and Sustainability Topic Paper, the UK is not on course to meet the carbon reduction targets of 51% of 1990 levels by 2025, and 57% by 2030.

15.1 Quotes from the Topic Paper:

Mitigating and adapting to climate change and reducing carbon emissions is at the heart of the environmental arm of achieving sustainable development as set out in the NPPF. "to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources

prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

The NPPF also highlights the importance for plans and spatial development strategies to be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements, including how it has addressed relevant economic, social and environmental objectives⁴. 2.21 With this, the NPPF is clear that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where this is unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

15.2 Plans must:

be proactive in mitigating and adapting to climate change, and ensure development and infrastructure will be resilient to future environmental conditions –such as increased flood risk (paragraph 149 and 150 (a));

15.3 Chapter 14 deals with the challenge of climate change and flooding. Addressing climate change is one of the core land use planning principles that the National Planning Policy Framework expects to underpin both plan-making and decision-taking. Plans are expected to: *“support the UK’s transition to low carbon future (paragraph 148); be proactive in mitigating and adapting to climate change, and ensure development and infrastructure will be resilient to future environmental conditions –such as increased flood risk (paragraph 149 and 150 (a)); ensure development is designed to help reduce greenhouse gas emissions, and where local standards are set for the sustainability of buildings, these should be in line with national technical standards (150 (b)); positively encourage the use and supply of renewable, low carbon and decentralised energy, to include identifying these opportunities and providing support for community-led initiatives (paragraphs 151, 152 and 153); support applications for renewable and low carbon development provided the impacts are acceptable (paragraph 154).”*

15.4 As described in my earlier point about Biodiversity, wildlife needs both the space and the connectivity to be able to move to new areas as the climate warms further.

16. Green development needs to be at the heart of the Local Plan. Development is not fully sustainable unless developers commit to green building practices and materials, creating low carbon homes, and pledge to work with wildlife organisations (eg RSPB, Wildlife Trusts) to incorporate wildlife-friendly features into their plans (eg retaining greenspace, creating highways for hedgehogs and including bat and swift boxes). This is best practice – and needs to become standard practice. (eg. Barratt’s Kingsbrook development at Aylesbury)

Included files

Title

Climate Change and Sustainability

ID	EGS13794
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.
Included files	
Title	Climate Change and Sustainability
ID	EGS13818
Person ID	1270385
Full Name	Ms Katy Regan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate

For the UK to meet its net zero obligations by 2050, local emissions must come down even faster. The airline industry and certain areas of manufacturing are particularly difficult to decarbonise, and the advancements which will allow for this will take some time. In contrast, there is already much that can be done to reduce our local emissions, and our local plan must play its part in this.

The plan does yet provide sufficient details to indicate how carbon emissions from the building and use of new homes will align with the government 2050 net zero target. Given the scale of building proposed, and even if this is significantly reduced, there is a clear conflict between plans for more building, significantly more Co2-producing population, and Co2 targets.

We are pleased to see that the Local Plan DM23 has been drafted to include a 19% improvement on carbon emissions as compared to Part L regulations, and a requirement for developers to contribute to on site renewable energy generation.

However, since the Emerging Local Plan was released there has been a Government announcement regarding the Future Homes Standard. From 2025 Part L regulations will be updated to require an even higher standard of carbon emissions reduction, with fossil fuel burners banned in new homes from this point, with a carbon emissions reduction of 75 to 80% compared to the current standard. Government has also advised, that to ensure industry is ready to meet the new standards by 2025, new homes will be expected to produce 31% lower carbon emissions from 2021.

This highlights the need for the Local Plan to have a comprehensive carbon reduction action plan in place. Individual ideas and policies are welcome, but we must first begin with an understanding of the carbon cost of development. This begins with proper measurement.

It is essential that we note that in building houses the carbon cost is more than simply the cost of heating the houses in future, the carbon cost of removing land from Green belt is significant. Soil is a large absorber of CO2, and when it is dug up and built over much of this is released, not to mention the lost future absorption.

Dacorum Borough Council needs to calculate its baseline CO2 emissions from housing, transport and land use. There is currently no acknowledgment in the Local Plan of the carbon cost of removing land from greenbelt. To play our part in meeting the UK net zero 2050 target, it will first be necessary to calculate the carbon cost of:

- 1) Removing any land from green belt or green field.
- 2) Building the houses, including carbon cost of materials involved and cost of transporting those materials.
- 3) Using those houses , eg heating, and providing electricity for their occupants.
- 4) Expected carbon emissions from travelling to and from those houses.
- 5) Expected carbon cost of dismantling and disposal of the assets at the end of life (this will encourage develops to use recyclable materials).

We urge the council to include a requirement for developers to do this calculation, potentially jointly with the Council and other stakeholders.

All carbon cost will need to be, as an absolute minimum offset, for us to play our part in meeting the 2050 net zero obligation, and developer contributions should be a part of this.

We welcome the requirement for two new trees to be planted for every new dwelling in major developments, but suggest that this is

- 1 Extended to minor developments, and
- 2 Considered in more detail, certified against an independent scheme (eg the Woodland Code) to ensure carbon sequestration from those trees over time, perhaps by using a third party to plant and manage the trees to ensure maximum CO2 capture.

Included files

Title Climate Change and Sustainability

ID EGS13840

Person ID 777073

Full Name Mrs Anne Lyne

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment Climate Change: Dacorum declared a Climate Emergency in July 2019. The Government require all builds to be carbon neutral by 2025. How is this consistent with the proposed housing target figures which will render that target unachievable?

The loss of Green Belt means losing CO2 capture but also adding to carbon use. How can DBC follow its declaration on Climate Emergency and carry on this massive level of development? It will not be possible for DBC to reach the carbon reduction target quoted in this Plan.

Included files

Title Climate Change and Sustainability

ID EGS13896

Person ID 1264756

Full Name Kathryn Salway

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>Climate Change and Sustainability</p> <p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.</p> <p>Dacorum declared a Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK Net zero housing – Project map – Good Homes Alliance.</p> <p>I welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see my response to Environmental Sustainability in question 1.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13981
Person ID	1270411
Full Name	Ms Jacqui Parr
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Climate Change and Sustainability comment	<p>All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.</p> <p>We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan. Currently it is not. We have the knowledge and technology to make good affordable zero carbon sustainable homes. We must demand that the Local Plan prioritises this.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS13996
Person ID	1270412
Full Name	James Mullins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	(17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.
Included files	
Title	Climate Change and Sustainability
ID	EGS14018
Person ID	1270425
Full Name	EMMA LELIEVELD
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	While the Climate Change and Sustainability policy has much to commend it, it will have no impact unless the proposed Local Plan as a whole supports these goals and that they are accepted by developers. The draft Local Plan does not provide the necessary information or comfort in this regard. The decision to set the government's ceiling as the target for new dwellings combined with the decision to significantly increase housing density - all without a plan as to how and by whom the environmental, transport and local infrastructure goals will be delivered - are wholly at odds with this policy.
Included files	
Title	Climate Change and Sustainability
ID	EGS14053
Person ID	1264962
Full Name	Courtney Culverhouse
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	Climate Change and Sustainability - commitments that are mandatory for all developers to follow (buildings to be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon).
Included files	
Title	Climate Change and Sustainability
ID	EGS14150
Person ID	1163439

Full Name	Lindy Weinreb
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>I welcome in particular the Topic - Climate Change and Sustainability and many of the comments included with these policies. Para 17.9 refers to NPPF Chapter 14</p> <p>Water supply in this area is constrained being supplied by the local aquifer which also feeds our Chalk Streams. The Environment Agency tells us that abstraction is to be restricted to 'current' levels. This poses a challenge to the Infrastructure Plan and is a critical aspect of the proposal to increase dwelling numbers by over 20% in this locality. Aside from 'climate change', with reduced rainfall, Residents will need assurance that the water supply is not threatened by the increased numbers.</p> <p>I note SP10 Climate Change Mitigation and Adaptation applies primarily to new development. I am pleased that existing stock is not forgotten as policy 3.i applies viz</p> <p>The Plan makes references to the Borough's Climate Change Strategy: I commend its ambition as set out in Para 17.24 and 17.25 on non-residential development</p> <p>This is set out in POLICY DM23</p> <p>I also note the several statements and Policies relating to Community Heat and Energy Networks. These are an improvement on previous policies and should be retained. Sadly they seem to have never found acceptance by developers in this Borough.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS14188
Person ID	1253654
Full Name	Jodie Bell
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.</p> <p>Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS14255
Person ID	1152075
Full Name	Rob Wakely
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.</p> <p>Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map.</p>

I welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see my response to Environmental Sustainability in question 1.

Included files

Title Climate Change and Sustainability

ID EGS14283

Person ID 1270629

Full Name Rob Bray

Organisation Details Head of Sponsorship & Fundraising
Tring Rugby Club

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment (17) Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

Included files

Title Climate Change and Sustainability

ID EGS14366

Person ID 1270640

Full Name Geoffrey Llewellyn

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment	<p>It is not enough for DBC to call a climate emergency and then develop a housing growth plan that locates developments in remote unsustainable locations that will by definition work against the worthy aims of the Climate Emergency initiative.</p> <p>It is also true that a single large-scale development or new town in one area offers the opportunity for infrastructure investment such as district heating, renewable energy and carbon neutral transport modes etc. that smaller developments cannot. BRAG accepts that the Garden Communities of north Hemel, HH01 and HH02 has that scale. In contrast, the proposals for South Berkhamsted and the other ridge-top Green Belt sites on the southern perimeter of the town will remove bio-diversity, and introduce non porous surfaces and pollution to a densely populated, high traffic area. In short, these sites can only contribute to the effects of climate change, regardless of policy statements.</p> <p>The Green Belt land between Berkhamsted and the A41 had previously been designated as an important ‘Green Lung’ for the town. That designation has clearly been dropped completely. In truth, if DBC had wanted to be bold and display a real commitment to the ‘Climate Emergency’ the plan could have highlighted how the health of those ‘Green Lungs’ could be improved by potentially using the land to expand historic woodland along with other bio-diversity improvements, rather than losing productive land in the chase for ‘targets’ that don’t exist.</p> <p>As CPRE has said, “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.....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, wellbeing and social inclusion. There is no evidence in the proposed local plan of such an approach.”</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS14548
Person ID	1270698
Full Name	Ms Elizabeth Hamilton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Climate Change and Sustainability comment

Under section 19(1A) of the Planning and Compulsory Purchase Act 2004 climate change mitigation and adaptation are core objectives which must be integrated across all local planning policies. National planning policy and guidance requires local planning to support radical carbon reductions to achieve net zero carbon across the whole economy by 2050, with robust evaluations of future emissions.

There is no indication in the Strategy of how the required reductions in carbon outputs, and sequestration of carbon across the Borough, will be achieved. There are statements that new developments will be low carbon, with no clear indication of how that situation will be reached, and little apparent appreciation of the massive behaviour change which will be required to achieve this state.

The Climate Change Committee in its December 2020 publication *Local Authorities and the Sixth Carbon Budget* sets out clear recommendations for local authorities. The top three are:

- 1 Develop Net Zero or Climate Action Plans with delivery projects that prepare the area to make the transition to net zero choices from 2030, and align with climate adaptation, biodiversity net gain and other key local strategies. Include immediate actions that kick-start delivery now and that support low-carbon and green skills and
- 2 Monitor and report on progress in reducing emissions to local communities and government. Where possible share standardised data, benchmark and provide clear evidence to inform
- 3 Conduct policy and service reviews to align policy, spending and functions with Net Zero. Identify contradictions, then put in place mitigation plans to align them at a future date and reduce emissions in the meantime. Develop project and financial appraisal systems that include emissions and climate

A completely new approach to planning is required in Dacorum, putting climate change mitigation at the centre, as other local authorities are now doing. Policies such as SP10, which proposes net zero carbon development only from 2030, jeopardises the aim of reaching net zero by 2050.

Para 2.24 on page 17 of the Strategy lists the main elements of the Strategy. The final bullet point states:

‘Protecting the character of the wider countryside and the value of protected / important sites as far as possible (such as important landscapes, heritage and biodiversity and avoidance of areas at high risk of flooding).’

This is incorrect and misleading. 'As far as possible' is not an option.

This statement sums up the whole attitude of the Strategy. Sustainable development is meant to be about delivering an environment to the next generation in an equal or better state than the one inherited. 'As far as possible' not only does not achieve that objective, but is also contrary to law and national policy regarding protected sites.

Dacorum Borough Council should be rigorously defending the natural capital of the Borough area, not adopting a strategic approach which allows that capital to survive only when left behind by its unjustified growth agenda.

Given that 85% of the Borough area is rural, it is surprising there is little evidence in the Strategy of a positive ambition to utilise fully the rural areas to contribute to climate change mitigation and adaptation. There is also scant recognition that the seriousness of the biodiversity crisis means that local authorities should have as part of their vision the ambition to improve biodiversity across their whole area and not just in conjunction with development. This would involve working in partnership with landowners, other interest groups and local communities.

In a Borough where 85% of the land is rural, it is also surprising not to see a rural strategy as part of the Strategy, to encompass in particular the need to identify and protect natural capital resources, including soils, which can contribute to carbon reduction targets and improve climate change resilience if managed well. This would also involve partnership working, especially with the agricultural community.

It is frankly shocking that in the first 187 pages of the Strategy, which set out the policy context, there are no specific policies relating to farming or agriculture other than in Policy SP12 stating that agriculture is one of the land uses permitted in the Rural Area. The reference in paragraph 15.16, stating that the NPPF encourages the development and diversification of agricultural and other land-based rural businesses, is not reflected in any policies. The impact of the huge loss of countryside to development on the agricultural community is not considered.

Included files	
Title	Climate Change and Sustainability
ID	EGS14556
Person ID	1270698
Full Name	Ms Elizabeth Hamilton
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	There is nothing in Policy SP10 (Climate Change Mitigation and Adaptation) about the need to embed water-saving and water use reduction measures in all new development, to allow for the likelihood of more frequent and more severe drought.
Included files	
Title	Climate Change and Sustainability
ID	EGS14567
Person ID	1270700
Full Name	Mr Peter Sims
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<ul style="list-style-type: none"> Climate Change & Sustainability - This shouldn't be about what the council is doing to its operations, this is about local planning. We don't 'want' a 'low carbon future' we 'NEED' a 'zero carbon' society as soon as possible if we are to have any hope of a 'future' in which we can thrive. As said above the Local Plan should mostly be about how we're going to change the existing build environment (e.g. retrofit existing buildings) to reach zero carbon rather than about new. That said clearly all new building built under a local plan passed by a council that's declared a 'climate emergency' will need to be 'zero carbon', otherwise it's just hypocrisy.
Included files	
Title	Climate Change and Sustainability

ID	EGS14570
Person ID	1270700
Full Name	Mr Peter Sims
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<ul style="list-style-type: none"> • As we've clearly established that the objectives are right, and the strategy they shape is flawed, it is there for clear that the Delivery Strategies maybe a good plan, but to solve the wrong • The biggest flaw with the delivery strategies is that despite acknowledging the climate emergency they are still strategies framed and structured in the same way they have been for the last few decades. Accepting emergency means revising priorities and planning over different time scales. If Dacorum has to get to zero carbon by 2030 (As it's own declaration implies), then this is the only time frame that matters. Declaring a Emergency is accepting that circumstance mean everything has to be reconsidered, and urgently. Dacorum, like the rest of the UK, therefore needs to be reconsidering it's plans for 2020-2030 as a matter of urgency, rather than worry about what it's going to be doing post <p>Evidence: https://www.greenhousethinktank.org/uploads/4/8/3/2/48324387/climate_emergency_plan_that_fucr_may20.pdf</p> <ul style="list-style-type: none"> • The biggest omission from the Delivery's strategies is that it is only about planning the construction of new buildings. What is desperately needed is a plan for how Dacorum is going to retrofit all it's current buildings (the majority of which are currently dependant on natural gas for heating) in line with government zero carbon strategy. The council and the government would be naive to think that everybody will just retrofit their own homes on the time frame required. The council will need to coordinate and plan how this massive retrofit program is going to work • Why do none of the delivery strategy maps include locations for renewable energy generation? The 'Hertfordshire Renewable and Low Carbon Energy Technical Study (July 2010)' shows there is significant onshore wind potential, but there doesn't appear to be any land allocated for the construction of wind turbines (again this seems to be a housing strategy not a sustainability strategy)

or local plan).

- There is no stipulating in the delivery of new buildings about the use of local materials, local contractors, a maximum size for any individual planning application under the local plan (lost of small construction project ensure more diversity of designers and local character not soleless estates).

Included files

Title Climate Change and Sustainability

ID EGS14592

Person ID 1270707

Full Name Ms Debbie Wilson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

Included files

Title Climate Change and Sustainability

ID EGS14663

Person ID 860814

Full Name Mrs Clare Joyce

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<ul style="list-style-type: none"> Climate Change & Sustainability: Lacks vision or ambition which is surprising considering Dacorum itself has declared a climate emergency. Dacorum should impose the highest energy standards for all new builds. Use of renewable energy sources (e.g. solar panels) should be maximised and recharging points for electric vehicles should be numerous and must be conditional on any Carbon off-setting should be the absolute last resort.
Included files	
Title	Climate Change and Sustainability
ID	EGS14675
Person ID	1270738
Full Name	JOHN BELL
Organisation Details	SECRETARY
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The UK government signed up to legal targets for the reduction of emissions, and has committed to net-zero emissions by 2050. These legal targets are likely to be revised upwards to be more ambitious as part of the COP26 climate conference to be held in Glasgow in November this year (postponed from 2020 due to the COVID-19 pandemic). DBC declared a climate emergency in the summer of 2019, but has yet to set out in detail how the borough will contribute to the government's legal targets. In other counties, legal challenges are being mounted to highlight how large-scale housing targets using greenfield sites are in breach of the climate change law.</p>

To avoid the same happening here, plans for net-zero to meet DBC's declaration of a climate emergency must feature bold and centre within the revised Local Plan, rather than climate change and biodiversity being shown to be negatively impacted by the plans in a side note (e.g. page NTS6 of Dacorum Local Plan Emerging Strategy for Growth Interim Sustainability Appraisal Report Non-Technical Summary). DBC is a member of the Hertfordshire Climate Change and Sustainability Partnership, and must step up efforts to contribute to and take account of the Carbon, Biodiversity, Transport and Water Sustainability Action Plans. These plans must take into account the carbon that is currently locked up within greenfield sites, that would be released if they are developed.

Included files

Title Climate Change and Sustainability

ID EGS14740

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

* No

Climate Change and Sustainability comment

1 *The policy will be applied to ensure that all new development ~~in~~ **is aspiring to achieve the Borough wide target of net zero by This will be achieved in a phased way as follows:***

1 *up until 2030, all new development will be required to accord with Policy DM23 - Energy and Carbon Emissions Reductions in New Development; and*

2 *from 2030 onwards, all new development will be **designed to minimise carbon dioxide emissions in aspiring to achieve net zero taking account of all levels of the energy hierarchy, and demonstrating how opportunities to achieve the Government's***

interim and longer term standards against Building Regulations have been considered and applied, where appropriate and achievable;

Taylor Wimpey is committed to working with DBC to seek to achieve net carbon zero by 2030, in line with the direction of travel being established at a national level for net zero by 2050. However, the approach to this needs

to be realistic and feasible, particularly when considered alongside wider delivery requirements associated with such large scale developments. It is important that the policy is not therefore placing onerous expectations on developers which could undermine the deliverability of its own allocations and instead promoting a transition towards a low carbon future through a fabric first/sustainable design approach.

As such, it is recommended that the wording of Part 2 of the policy is amended as proposed to ensure it is consistent with the NPPF in seeking to minimise carbon dioxide emissions and aligns more closely with the wording of draft Policy DM22 (Sustainable Design and Construction).

Included files

Title Climate Change and Sustainability

ID EGS14748

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

* No

Climate Change and Sustainability comment

1 *c. Incorporate green infrastructure to sequester carbon, to include **maximising opportunities for the planting of new trees on-site. two or more new trees (a tree shall be considered to count if it ordinarily reaches a mature height of 6 metres or more) per dwelling or per 100 sq m floor space (for non- residential developments) on-site.***

Taylor Wimpey’s aspiration for Land at South Berkhamsted is to create a green infrastructure/landscape-led development and the principle of new tree planting is supported. It may well be that such large scale developments can achieve and even exceed the proposed requirement of 2+ new trees per dwellings or 100sqm of non-residential floorspace. However, it is a level of detail that will not be known for certain until the detailed design/masterplanning stages. Therefore, as a blanket policy requirement it seems arbitrary and should be based on detailed impact considerations to include existing tree coverage; site location and suitability; within the context of site constraints; and balanced alongside the delivery of other identified infrastructure items.

It is therefore recommended that emphasis is instead placed on encouraging the maximisation of opportunities for new tree planting as part of strategic developments and this would ensure the policy can be considered to be justified in satisfying the tests of soundness.

Included files

Title Climate Change and Sustainability

ID EGS14749

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

Climate Change and Sustainability comment 1 a. ii. contribute to a ~~further 20%~~ reduction in residual carbon emissions through the provision of on-site renewable energy generation, or provision and connection to decentralised low carbon energy sources, **where appropriate and viable.**

It is not clear where the additional 20% requirement has derived from and appears unnecessary when considered against the national interim and longer terms standards being established as well as Building Regulations, which should form the technical evidence that such policy requirements are based on. This requirement would need to be justified in order to satisfy the tests of soundness and therefore it is recommended that the wording is amended to place emphasis instead on a reduction through on- site renewables, where appropriate and viable. In line with national guidance, this then allows for the feasibility of such to be tested on a site specific basis and balanced as part of wider development proposals.

Included files

Title Climate Change and Sustainability

ID EGS14750

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 * No	Yes
Climate Change and Sustainability comment	<p>1 <i>All major development proposals within a Renewable Energy Opportunity Area (as shown on Figure 6) or in defined Growth Areas, will be expected to either:</i></p> <ul style="list-style-type: none"> • <i>create a site-wide community heat or energy network, where practical, feasible and viable; or</i> • <i>connect to an existing decentralised network where this is available, practical and feasible; unless it can be demonstrated through an energy feasibility assessment that:</i> <ol style="list-style-type: none"> 1 <i>a better alternative for reducing carbon emissions from the development (taking into account the potential efficiencies from expanding the network in future) can be achieved; or</i> 2 <i>heating and/or cooling large parts of any scheme do not justify a heat or power connection; or</i> 3 <i>the cost of achieving this would make the proposed development</i> <p>Whilst Taylor Wimpey support the principle of sustainable heating in accordance with emerging Building Regulations and in contributing to the lowering of carbon emissions, more information is required on this before it can be considered further as a potential Growth Area requirement.</p> <p>The proposed amendments are therefore considered necessary to ensure there is an allowance for the testing of the most practical, feasible and viable solution at future stages in the planning process. This will need to be accompanied by supporting technical information to justify the approach and is required in order to satisfy the NPPF tests of soundness.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS14758
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759

Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>The draft policy SP10 is aspirational and aims for all new development to be net zero by 2030. This policy should be considered through the viability testing work associated with the Plan, this should include consideration of on-site methods and any off-site contributions towards a carbon off-set fund. It will need to be demonstrated that a carbon off-set fund meets the tests for planning obligations as set out in the NPPG. Policy wording should be sufficiently flexible to ensure that developments are not rendered unviable or undeliverable. Any forthcoming SPDs should be in general accordance with the policy so as not to conflict with the viability work associated with the Plan. Through the Future Homes Standard, the Government has brought in interim changes to Part L and F of the Building Regulations to address energy efficient, low carbon homes. Any requirements for standards above this should be properly evidenced. These comments also apply to draft Policies DM22-24.</p> <p>5.9 Policy DM22 Sustainable Design and Construction and DM23 Energy and Carbon Reductions in New Development are intended to assist in delivering SP10. DM23 applies to new developments pre-2030 to deliver reductions in CO2 emissions up to 2030, at which point the net zero aspiration set out in SP10 takes effect. The requirements of this policy, in particular DM23, unnecessarily duplicate the requirements set out in the Building Regulations. It is important that the proposed policy approach does not go beyond or conflict with the Government's ongoing Building Regulations uplift for Part L and Part F. The June 2022 Part L Interim Uplift will be in place ahead of the Plan and applies to all new developments. This forms part of a wider roadmap to 2025 implementation of the Future Homes Standard. If such policies are retained, the requirements should be included in viability testing of the Plan.</p> <p>Policy DM24 requires that all major developments within a Renewable Energy Opportunity Area or defined Growth Area will be expected to either create a site-wide community heat or energy network or connect to an existing decentralised network. There are exceptions where it can be demonstrated through an energy feasibility assessment that there is a better alternative, it is not justified or it would render development unviable. This should be considered on a site-by-site basis to find the best solution for each site. Heat or energy networks may be an option to reduce carbon emissions from new developments, but they are not the only option and may not be the most appropriate or achievable hence why a less prescriptive site-by-site approach is suggested. Furthermore, technology is constantly evolving and improving so there may well be better means of achieving carbon reductions and any policy should be flexible enough to allow for this. Heat networks can be extremely expensive to install and maintain across the lifetime of a development. At present there is no viability assessment to evaluate to costs of this alongside other policy requirements therefore it is not possible to say if this policy is achievable. This will need to be considered through future viability work. In the absence of this evidence and the inability to determine if this policy is achievable, it is unsound.</p>

5.10 Policy DM26 sets out that where development cannot meet the greenhouse gas reduction requirements on site it will be expected to contribute to the Council's Carbon Offsetting Fund. The principle of allowing for an off-site contribution is supported as there may be some sites where on-site provision is either unfeasible or unviable. Any off-site contributions will need to meet the tests set out in the NPPG. This should be considered through the viability assessment of the Plan.

Included files

Title Climate Change and Sustainability

ID EGS14805

Person ID 1264510

Full Name Martin Evening

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment

3. The Dacorum DLP completely fails to address our Climate Emergency.
 If this plan is implemented, these damaging proposals would result in the loss of a massive 850 hectares of the Green Belt. It is clear that within this DLP Dacorum are declaring a mission to provide 100% of their self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity, causing significant harm to the Green Belt and AONB.

Policies in a Local Plan should concentrate on building in urban areas away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value.

Where I live in Northchurch, we have Ancient Woodlands and rural hedges which need to be protected. These form Wildlife Corridors and are tracts of land with continuous or close-by pockets of natural or semi-natural habitat.

It also jeopardises plans, currently in early stages of discussion, to potentially extend the AONB or upgrade its status to that of a National Park.

The Government is still working on the planning reforms proposed in the recent White Paper 2020: Planning for the Future and the outcomes of the Public Consultation on that policy. This is particularly relevant to calculation of housing needs, location of these and protection of Green Belt and AONB. Why not wait for this paper to be finished?

4. The Dacorum DLP should use an integrated approach that puts climate change, biodiversity and well-being and social inclusion at the centre of their plan.

DBC declared a Climate Emergency over a year ago. This proposed DLP clearly prioritises economic growth and greenfield land development above the Climate Emergency!

The Dacorum DLP needs to include minimum housing specifications for developers, which takes into account carbon reduction/neutral plans such as minimum insulation requirements, rainwater harvesting, solar power, electric car charging points, ground source heat pumps and air source heat pumps for each new house proposed to be built. This would have a positive impact on the environment instead of a negative.

Currently the plan just uses the word 'encouragement' which is completely insufficient for the point we have reached in the Climate Emergency.

This is a requirement of the NPPF and the 2004 Planning and Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050. This should be underpinning a revised land use and development strategy.

Included files

Title Climate Change and Sustainability

ID EGS14840

Person ID 325470

Full Name Gardener Family Trust

Organisation Details Gardener Family Trust

Agent ID 1270807

Agent Name Mr
Alistair
Brodie

Agent Organisation Henry H Bletsoe & Son LLP

Yes / No

* Yes

* No

Climate Change and Sustainability comment We acknowledge and support the policies set out in DM23 regarding the reduction in energy use and carbon emissions required for new development.

Included files

Title Climate Change and Sustainability

ID	EGS14853
Person ID	1270808
Full Name	Westmorland Limited
Organisation Details	Westmorland Ltd
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>This draft policy sets out the approach to mitigating and adapting to climate change and to actively pursue the reduction in carbon dioxide emissions. The policy will be applied to ensure all new development in the Borough is net zero by This policy operates in conjunction with policies DM22-24 to deliver this strategy.</p> <p>Whilst the ambition of the Council is welcomed, there is concern that being too prescriptive may prevent development proposals from coming forward either due to viability or that it could stifle other policy ambitions, say for example in relation to design or minimising impact on the landscape, from being achieved. It is likely over the lifetime of the plan there will be other standards that are better measures of sustainability or energy use/ generation that emerge overtime and policies, as currently drafted, could prevent these potentially improved approaches from being applied. It is, therefore, paramount that as regulations in respect of this theme are changing so quickly that the policy framework remains flexible to allow for such alternative approaches, targets and measures to be used to demonstrate the sustainability and energy efficiency of a proposal.</p> <p>Indeed, it is understood that the private energy generation sector is rapidly growing creating green energy through the national grid. In some cases, due to particular local circumstances, it may be more effective for energy to be sourced by a community and/ or national source, in which case allowances should be included within the policy framework for such schemes where on site provision is not justified.</p> <p>In accordance with national requirements, it is anticipated that the viability and achievability of the policies will be tested prior to submission to the Secretary of State.</p> <p>Policy DM26 sets out that where development cannot meet the greenhouse gas reduction requirements on site it will be expected to contribute to the Council's Carbon Offsetting Fund. The principle of allowing for an off-site contribution is supported as there may be some sites where on-site provision is either unfeasible or Any off-site contributions will need to meet the tests set out in the NPPG. Again, this should be considered through the viability assessment of the Plan.</p>

As shown in the Vision Document, contained in **Appendix 1**, part of the proposed site has been identified for compensatory improvements to the environmental quality of the land that will remain within the Green Belt. This localised platform for biodiversity enhancement could provide improvements to landscape character and visual amenity, as well as provide carbon offsetting contributing to the sustainability of the expansion of Watling Street Truckstop.

Included files

Title Climate Change and Sustainability

ID EGS14890

Person ID 1144629

Full Name Mrs SOPHIE LAWRANCE

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Climate Change and Sustainability comment Policy SP10 (Climate Change Mitigation and Adaptation) appropriately refers to "prioritising the development of previously developed land in sustainable locations"³⁰ and to "*encouraging the use of sustainable transport modes in all new development*";³¹ however, this is not borne out by the proposed site allocations, many of which are on greenfield/Green Belt land in non- sustainable locations.

Included files

Title Climate Change and Sustainability

ID EGS14921

Person ID 1270836

Full Name Tully Children's Fund

Organisation Details Tully Children's Fund

Agent ID 1270837

Agent Name Sav
Patel

Agent Organisation	Associate Director Strutt & Parker
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>The Council declared a Climate Emergency in July 2019 to respond to the challenges of reducing the impact of climate. These challenges should be at the forefront of the ESG so as to promote a growth strategy that positively contributes towards achieving the Council's goals of reducing climate change through sustainable growth. Unfortunately, the ESG is seeking to retrofit the mitigation around the growth strategy, rather than it being the starting point to inform the strategy. Indeed, there is significant evidence from other similar growth strategies in St Alban City & District and Uttlesford District that demonstrates such large allocations are not sustainable.</p> <p>An over reliance on large sites for housing delivery, rather than a more holistic approach comprising a range of site sizes, is a common reason Planning Inspectors determine draft local plans to be unsound. Paragraph 68 of NPPF recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area as they can be built out relatively quickly. It specifically requires local planning authorities to identify at least 10% of their housing requirement on sites no larger than 1 hectare.</p> <p>It is unclear if the ESG has carried out a carbon calculation to demonstrate the amount of carbon emissions that each of the large allocations would create and what effect mitigation measures would have in off-setting the impact. Clearly, the amount of carbon produced just from providing the infrastructure to develop the site would be significant in itself. Therefore, the allocations would start with a significant carbon debt before even breaking ground.</p> <p>Sites such as those owned by my client, which are available for development to deliver housing in the short term, would provide a strong basis to facilitate the Council's growth. Such a strategy would help support local businesses, help relieve house price hotspots, and fundamentally increase choice and locations for people to live. The COVID- 19 pandemic has demonstrated that most office-based workers can work from home without impacting productivity. This significant cultural shift is likely to make the rigid 9-to- 5, office-centric, commuter patterns of work look out of date and new ways of working will become more accepted. People will no longer need to live close to where they work and with significant increases in online deliveries they also do not need to live near larger centres. It is therefore important that the ESG acknowledges and makes provision for this cultural shift by dispersing growth throughout the Borough. The ESG has the opportunity to be at the forefront of this cultural shift by finding an alternative and future-proof growth strategy to that which is currently proposed.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS14954
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 Gorbng
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>Climate change and sustainability</p> <p>HCC supports the Council's approach in respect of reducing carbon emissions to minimise impacts on the climate. Notwithstanding this, it is considered that climate change policies should be output focused, allowing for innovation in technologies.</p> <p>With regard to Policy DM22, HCC supports the majority of objectives within this policy, with the exception of clause Whilst the planting of new trees within development is supported in principle, the requirement of 'two trees per dwelling' on site is potentially onerous and will undermine the design process and optimisation of development. The proposed design codes for the Tr01 Growth Area would be the appropriate place to secure tree planting that is appropriate to the specifics of the site. Whilst the draft NPPF has added a paragraph to emphasise the importance of tree planting in streets it does accept that in specific cases, there may be justifiable reasons why this would be inappropriate. Policy DM22 should reflect that flexibility.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS14972
Person ID	1207224
Full Name	Chris Padley
Organisation Details	Environment Agency
Agent ID	
Agent Name	
Agent Organisation	

<p>Yes / No * Yes * No</p>	<p>Yes</p>
<p>Climate Change and Sustainability comment</p>	<p><u>Climate Change and Sustainability</u></p> <p>Policy SP10 – Climate Change Mitigation and Adaptation</p> <p>We are pleased to see a climate change policy within your local plan. Point 3.c covers carbon fixing and storing habitats. Wetland habitats also fix and store carbon and also contribute to biodiversity net gain and it would be beneficial to promote these in Dacorum due to the number of watercourses in the borough.</p> <p>Point 3.i covers retrofitting as a contribution to net zero carbon. The retrofitting schemes should include a fittings approach, reducing buildings water usage and therefore carbon emissions of these buildings.</p> <p>4.c mentions reducing flood risk by using permeable surfaces. This should include driveways and parking areas to alleviate surface water flooding issues.</p> <p>We would like to see the following sections to be expanded to include the following:</p> <p>3.c <i>increasing the area of habitats that fix and store carbon, including tree planting <u>and the creation of wetland habitats.</u></i></p> <ul style="list-style-type: none"> • <i>supporting retrofitting schemes to the existing building stock to meet higher energy <u>and water</u> efficiency standards.</i> <p>4</p> <ol style="list-style-type: none"> 1 <u>assessing flood risk appropriately, taking climate change into account, to inform decisions relating to finished floor levels, safe access/egress routes and floodplain compensation</u> <ol style="list-style-type: none"> 1 <i>using green infrastructure to reduce flood risk, tackle urban heat island effects and provide solar shading; and</i> 2 <i>adapting to climate change by ensuring development avoids areas of flood risk and reduces the risk of flooding elsewhere, through the use of measures including sustainable urban drainage systems, green roofs and walls, permeable surfaces, <u>reconnection of floodplains, creation of wetland habitats and other natural flood management</u></i> <p>We are also pleased to see the inclusion of this policy and that it includes a residential water consumption limit to 110 liters per person per day as we are in a region of serious water stress.</p>

All new homes have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

The National Planning Policy Framework (NPPF) policies expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. The local planning authority can consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.

Our 'Water Stressed Areas Final Classification (2013)' is a primary source of evidence which supports a tighter water efficiency standard. It identifies areas of serious water stress, where household demand for water is a high proportion of the current effective rainfall available to meet that demand.

We advise the Secretary of State that the areas classified as 'Serious' in the final classification table should be designated as 'Areas of serious water stress'. The Affinity Water supply region (of which Dacorum is located) is identified as an area of serious water stress.

In our view, this provides evidence to suggest that the optional higher water efficiency standard should be applied to help manage this stress and we are pleased that you have done so in your local plan.

In addition, Affinity Water's Water Resource Management Plan 2019 identifies how Affinity Water will manage the supply and demand balance over the next 25 years. It shows what demand and supply measures will be introduced to manage the longer term challenge of population increase, climate change, drought resilience and growing environmental needs. It is currently forecast that if we take no action, Affinity Water will need over 100 million litres more water than is currently available. Reducing levels of water consumption is crucial to ensuring sustainable water supplies in future. In response, reducing the levels of consumption will help to counteract the reduction in resource availability as well as other proactive alterations.

It would also be strongly encouraged to outline water resources and efficiency within this policy with reference to the standards to meet both the Building Regulations Part G and the BREEAM assessments for 'excellent' ratings for water efficiency.

We would like to see the incorporation of blue infrastructure alongside green infrastructure. You may want to revisit your tree requirement to be more aligned with the new biodiversity net gain requirements of a 10% increase, i.e. a percentage increase of trees rather than a number of trees, or a combination of both? Whichever will result in the higher amount of trees? Suggested wording could be:

‘3.c. Incorporate green and blue infrastructure to sequester carbon, to include the biodiversity net gain requirement of 10% more trees than on site pre-development or two or more new trees (a tree shall be considered to count if it ordinarily reaches a mature height of 6 metres or more) per dwelling or per 100 sq m floor space (for non-residential developments) on site, whichever results in the higher number of additional trees.’

We would like the ‘future proof’ part of the policy to be expanded to include the lifetime of flood defences (offering protection to the location of the development) to ensure that it be commensurate with the lifetime of the development. If this cannot be demonstrated, the ability to upgrade or replace the defence in future must be demonstrated. Otherwise developments will not be future proofed and will become vulnerable to flooding in the future. This approach is already in action along the Thames where developers must ensure flood defences are adequate for the lifetime of the development. Suggested wording could include:

‘3.f. Ensure development is ‘future proofed’ against flood risk enhanced by climate change by ensuring any flood defences on site are adequate for the lifetime of the development. If not the ability to upgrade or replace the defence must be demonstrated.’

Again, in section 4.c. the minimum net-biodiversity gain should be 10% and this should be reflected in the policy wording. If Dacorum would like to be ambitious and a leading council in this field you could stipulate a higher percentage. This would also bring this policy more aligned with your biodiversity net gain policy. Suggested wording is as follows:

‘4.c. Deliver an overall net-biodiversity gain of 10% and positive measures to support wildlife’

Included files	
Title	Climate Change and Sustainability
ID	EGS15060
Person ID	1270849
Full Name	Ms Jessica Lindfield
Organisation Details	St William Homes LLP

Agent ID	210999
Agent Name	Mr Martin Friend
Agent Organisation	Director Vincent & Gorbing
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>CLIMATE CHANGE AND SUSTAINABILITY</p> <p>Climate Change Mitigation and Adaptation</p> <p>As part of the Berkeley Group, St William recognises the importance of reducing carbon emissions to minimise climate change and have adapted their business to help ensure that the homes they create remain resilient to changes in temperatures. As well as focusing on efficiencies, they are now going beyond Government requirements by compiling a zero carbon transition plan for each new development to enable the homes to operate at net zero carbon by This is to ensure they incorporate the right long term infrastructure into their developments. They therefore support the Councils intentions to mitigate and adapt to climate change.</p> <p>Notwithstanding this, climate change policies should be outcome focussed - overly prescriptive energy policies can limit freedom to deliver the most suitable and effective long term carbon/sustainable strategies for a site.</p> <p>The ambition of the Council to secure all development to be net zero by 2030 is However, St William does note that at present this is beyond the Government’s own objective and is not supported by national policy. Whilst St William therefore support the policy in principle it is important that this does not place a burden on development such that it impedes the delivery of much needed new homes. We therefore consider that clause (2) of policy SP10 should be amended with the introduction of the words ‘Subject to feasibility and viability this will be achieved in a phased way...’</p> <p>A reference to taking account of viability should also be included in DM22 and DM23.</p> <p>With regard to Policy DM22, St William support clauses 1 and 2 and the majority of the mitigation measures proposed in clause 3 with the exception of clause c. Whilst the planting of new trees within development is supported in principle, the requirement of ‘two trees per dwelling’ on site is onerous and will undermine the design process and optimisation of Whilst the draft NPPF has added a paragraph to emphasise the importance of tree planting in streets it does accept that in specific cases, there may be justifiable reasons why this would be inappropriate. Policy DM22 should reflect that flexibility.</p> <p>On the National Grid site, Policy DM22 would result in a requirement of well over 800 new trees which would result in sterilising of large areas of the site. The policy should be amended to a general requirement for the planting of new trees.</p> <p>The adaptation measures in clause 4 are also supported.</p>

Sustainable Design and Construction

It is noted that the Plan at para. 2.24 states that the Council will update their planning and design guidance to allow more contemporary and innovative approaches to development, including supporting offsite construction and other forms of Modern Methods of Construction (MMCs) to increase delivery. However, this does not appear to be properly reflected in St William suggest that either Policy SP13 (delivering High Quality Design) or Policy DM22 (Sustainable Design and Construction) should include a clause which makes clear the Council’s positive support for off-site construction and other forms of MMC.

Carbon Off-setting

St William do not object to Policy DM26 – Carbon Offsetting – in principle. However, the level of off-setting required will need to be carefully considered and, again, viability is crucial to ensure that this requirement does not prevent development. We suggest the addition of the sentence at the end of para, 2 as follows :-

“Where appropriate, the level of financial contribution will take account of the overall viability of the development.”

Included files

Title Climate Change and Sustainability

ID EGS15083

Person ID 1261425

Full Name Camilla Pascucci

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

1 The Dacorum DLP completely fails to address our Climate Emergency.
If this plan is implemented, these damaging proposals would result in the loss of a massive 850 hectares of the Green Belt. It is clear that within this DLP Dacorum are declaring a mission to provide 100% of their self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity, causing significant harm to the Green Belt and AONB.

Policies in a Local Plan should concentrate on building in urban areas away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value.

Where I live in Northchurch, we have Ancient Woodlands and rural hedges which need to be protected. These form Wildlife Corridors and are tracts of land with continuous or close-by pockets of natural or semi-natural habitat.

It also jeopardises plans, currently in early stages of discussion, to potentially extend the AONB or upgrade its status to that of a National Park.

The Government is still working on the planning reforms proposed in the recent White Paper 2020: Planning for the Future and the outcomes of the Public Consultation on that policy. This is particularly relevant to calculation of housing needs, location of these and protection of Green Belt and AONB. Why not wait for this paper to be finished?

- 1 The Dacorum DLP should use an integrated approach that puts climate change, biodiversity and well-being and social inclusion at the centre of their

DBC declared a Climate Emergency over a year ago. This proposed DLP clearly prioritises economic growth and greenfield land development above the Climate Emergency!

The Dacorum DLP needs to include minimum housing specifications for developers, which takes into account carbon reduction/neutral plans such as minimum insulation requirements, rainwater harvesting, solar power, electric car charging points, ground source heat pumps and air source heat pumps for each new house proposed to be built. This would have a positive impact on the environment instead of a negative.

Currently the plan just uses the word 'encouragement' which is completely insufficient for the point we have reached in the Climate Emergency.

This is a requirement of the NPPF and the 2004 Planning and Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050. This should be underpinning a revised land use and development strategy.

Title	Climate Change and Sustainability
ID	EGS15103
Person ID	1270925
Full Name	Mrs Kathryn Salway
Organisation Details	Extinction Rebellion Dacorum
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<p>Climate Change and Sustainability</p> <p>The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability.</p> <p>Dacorum declared a Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions.</p> <p>All construction must be carbon neutral from development to finished build. Please see some examples already in the UK Net zero housing – Project map – Good Homes Alliance.</p> <p>We welcome the plans for reducing building power demand in the form of high insulation levels and building orientation but please also see our response to Environmental Sustainability in question 1.</p>
Included files	
Title	Climate Change and Sustainability
ID	EGS15209
Person ID	1264623
Full Name	Judy Chausalet
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<u>Climate Change and Sustainability</u> : The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions. All construction should be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map .
Included files	
Title	Climate Change and Sustainability
ID	EGS15210
Person ID	1271003
Full Name	Thierry Chausalet
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<u>Climate Change and Sustainability</u> : The plan should be much more ambitious in its goals and focus on Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. The policies and plans for growth must represent net zero carbon emissions. All construction should be carbon neutral from development to finished build. Please see some examples already in the UK: https://goodhomes.org.uk/net-zero-map .
Included files	
Title	Climate Change and Sustainability
ID	EGS15230
Person ID	1271006
Full Name	Ms Zoe Wiggins

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.
Included files	
Title	Climate Change and Sustainability
ID	EGS15290
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<u>Chapter 17 : Climate Change and Sustainability</u> The Crown Estate has already publicly committed itself to being a zero carbon business by 2030. For this reason, TCE support the principle of the policies contained in this Chapter. However, TCE has concerns regarding detailed wording, definitions and the need to clarify the scope of policies. These are set out below.

- **Policy SP10 : Climate Change Mitigation and Adaptation**: The importance of realising that a net zero carbon built environment as a key component of our national commitments to decarbonise the UK to net zero greenhouse gas emissions by 2050 is appreciated and there is a need for robust policy measures to enable its delivery. On this basis, the principle of the policy is supported.
- It is recommended that the policy explicitly states that reductions in energy consumption and carbon emissions should be sought with reference to the energy hierarchy, prioritising reducing the demand for energy through passive design and energy efficiency measures, before seeking opportunities to supply that energy through efficient and innovative ways, before finally maximising the provision of on- site low and zero carbon technologies (Be Lean, Be Clean, Be Green).
- Clarification is needed on whether this net zero target applies to developments in operation, construction (embodied), or whole life (in line with the UKGBC framework definition for Net Zero). In any case, details of the expected methodology to calculate and report on this are

Part L is recognised to be a poor determinant of true operational performance. As such, it is recommended that buildings' operational energy consumption is determined using the CIBSE TM54 or Design for Performance methodologies. Recognising that, as operational efficiency improves and the carbon intensity of grid-supplied electricity reduces, the proportion of a building's whole life impact that is embodied within the construction materials and processes increases, it is recommended that building's assess their whole life carbon emissions using the Royal Institute of Chartered Surveyors (RICS) methodology, considering Module A1-5 (embodied up to practical completion) and B7 (operational energy, calculated through detailed operational modelling, as previously noted).

- With respect to offsetting/mitigating any remaining emissions once all on site measures have been exhausted, support for credible renewable energy procurement routes (in line UKGBC guidance) should be referenced in advance of financial carbon
- With respect to operational emissions, confirmation is needed on whether a development should achieve net zero regulated emissions (in line with Building Regulations Part L calculations) or net zero emissions based on metered annual energy If the latter, clarity on the mechanism to realise this is needed.
- Should detailed operational energy modelling be conducted as per the previous point, then this should be used to calculate any remaining emissions to mitigate/offset to reach net zero operational emissions in line with the UKGBC framework, to ensure consistency and most robustly achieve net zero

- **Policy DM22 : Sustainable Design and Construction** : The objective of this policy – seeking to reduce the embodied impact of the construction materials and process – is a necessary component on the route to achieving a net zero carbon built environment and the policy is therefore supported in principle.
- ‘Low embodied carbon’ is open to interpretation. Clear guidance on what the Council considers to be ‘low’ for each building element would be needed to meet / enforce this policy. There are many industry bodies which have identified embodied carbon targets/benchmarks for buildings, e.g. LETI, RIBA. These could be referenced by the However, any policy should be cognisant of the fact that some targets apply to broad use types and do not appreciate the variation in embodied carbon that is a consequence of building typology. For example, both LETI and RIBA set targets for embodied carbon in new dwellings which are achievable for new semi-detached, detached, and terraced housing but are incredibly challenging/impossible for medium- and high-rise apartments blocks to achieve, due to structural limitations and other factors (see UKGBC Building to Net Zero study). As such, there should remain some flexibility in the policy to appreciate contextual and typological factors.
- Assessing embodied carbon is beyond the scope of any work to date, and should prescriptive requirements need to be met for embodied carbon, this could significantly impact the building design, build cost and supply chains. A more reasonable requirement would be to assess the embodied carbon of the proposed design and seek to offset this carbon alongside any remaining operational carbon emissions in line with the UKGBC framework definition.
- **DM22(4)(a)** : This refers to grey water recycling. This should be listed as one of the options to minimise the use of water to 110 litres per person per day and reduce the risk of The policy should not be prescriptive about its use.
- **DM22(4)(d)** : Whilst green roofs have a role in sustainable design, they will only be appropriate in certain contexts. The policy should recognise that green roofs are one of a portfolio of mitigation / adaptation measures which could be employed.
- **DM22(6)** : It is not sound practice to expect compliance on a policy within a document which has yet to be produced (the Climate Change and Sustainability SPD).

Policy DM23 : Energy and Carbon Emissions Reductions in New Development

- **DM23(1)(a)(i)** : 19% improvement over the TER. It is assumed that a 19% reduction is in line with previous Code for Sustainable Homes (CfSH) Level 4 and is the maximum improvement local authorities can require in policy.

- Assuming local authorities will retain the power to set more stringent targets than national policy, is this 19% improvement over the Buildings Regulations current now, at the time of outline planning permission, or when reserved matters applications are made? Currently, Part L 2013 is adopted, Part L 2020 due to be adopted later this year, and the Future Homes Standard is on the horizon in 2025. As a consequence, the implications for building design and performance are likely to be different depending on the answer to this
- The suitability of achieving this reduction over the Part L 2013 TER using the current adopted Part L 2013 carbon factors is challenging as Part L 2013 carbon factors have been demonstrated to be wildly misrepresentative, with the carbon factor for electricity being over 3x greater than in reality (and almost 4x greater than proposed in SAP 10.1). As such, a framework for producing energy strategy calculations using current carbon factors from a robust source (e.g. Defra, BEIS, National Grid) should be sought.
- A 19% reduction against future Building Regulations baselines would depend on the shape of the new Regulations. Given the detail of the emerging policy, a 19% reduction would be significantly more challenging and impact on The policy should also consider the implications of the emerging shape of proposed Part 2 / SAP10.1, since achieving the TER through energy efficiency measures alone would be very challenging once this comes into force.
- **DM23(1)(a)(ii)** : It needs to be clarified whether local low-carbon heat sources (eg. heat pumps) would count towards a further 20% reduction in residual carbon.
- **DM23(1)(b)** : Local Plan policies often include a minimum building size threshold below which BREEAM 'Excellent' does not have to be met. This is because small buildings tend to find it difficult to achieve all the necessary BREEAM credits. It should also be noted that BREEAM standards are being updated and may be changed by the time of the Reg 19
- **DM23(2)(b)** : The explanatory text should indicate the Council's preferred route to monitoring and certifying actual performance of buildings. Air quality and overheating are not normally associated with concerns about a 'performance gap'.
- **DM23(2)(b)** : The on-going monitoring proposal for the first 5 years is difficult to enforce since it is the occupiers prerogative whether to grant access to their home for testing and access to their energy data. This is outside the control of the housebuilder

/ developer.

- **Policy DM24 : Low Carbon Community Heat and Energy Networks** : This policy should be widened to include all forms of low carbon heat and energy (eg solar and heat pumps) and not just networks. Site wide heat networks were formerly an effective way to deliver low carbon heat, due to the fact that combined heat and power engines

were more efficient and had a higher power-to-heat ratio as the load they were sized to meet increased ie. the more homes, the more efficiently and the greater amount of relatively low carbon electricity you could generate. In the last 6 years, CHP has gone from an effective means of reducing net carbon emissions to causing a net increase in emissions due to the rapid decarbonisation of the electricity from the grid which it offsets. Now, heat networks should be served by low carbon heat sources, such as heat pumps. Heat pump efficiencies do not benefit from the scale of the load to be met; a dwelling-level heat pump will generate heat just as efficiently as one sized to meet the demands of hundreds of thousands of homes. Heat networks have the following drawbacks :

- High network losses, particularly at suburban scale – the lengths of pipework needed to distribute heat around a development of this scale would experience significant thermal losses to the ground, significantly reducing the overall efficiency of the heat
- High embodied energy / carbon – the groundworks and pipework required for the network will have inherently high embodied energy which would be avoided with local heating systems Require central management – an ESCO would need to be contracted to manage the heat network infrastructure and Further to this, people would not have autonomy over their heat.

The policy should be re-cast to reflect actual evidence of the impact of a decarbonised grid and the role of local heat pumps.

It should be noted that **Figure 6** ‘Opportunities for Renewable Energy’ is out of date (2010) and needs revising.

Policy DM25 : Stand-alone Renewable or Low Carbon Energy :

No comment.

Policy DM26 : Carbon Offsetting :

- Offsetting carbon associated with operational energy consumption and embodied impacts of developments is the final, but critical, step in achieving net zero carbon built environment in line with the UKGBC definition. However, an LPA-defined offset fund such as proposed is unlikely to fulfil the criteria to be a suitable offset in line with guidance.

- The Council should confirm the carbon offset rate (£/tonne). Information on the intended use of the fund, demonstrating that the Council has the ability to deploy it to leverage meaningful reductions in greenhouse gas emissions across the Borough is
- Clarity on which of the requirements in Policy DM26 are absolute and which can be offset will be important for establishing the relative benefits of design and strategy Where a developer has identified a credible approach to carbon offset, policy should remain flexible provided that the offset approach demonstrates robust carbon savings and true additionality in line with recognised industry criteria (e.g. Oxford, UKGBC, or are accredited).

Included files

Title Climate Change and Sustainability

ID EGS15458

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

Climate Change and Sustainability comment SEE ATTACHED RESP

Included files

Title Climate Change and Sustainability

ID EGS15501

Person ID 400475

Full Name Mr Michael Demidecki

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	Policy Sp10 “Climate Change Mitigation and Adaptaion” Part 3d & 3e (page 100) “on site renewable and low carbon energy sources in development site, and stand-alone renewable energy or low carbon schemes” should be made mandatory or as a planning condition not merely encouraged
Included files	
Title	Climate Change and Sustainability
ID	EGS15538
Person ID	1271381
Full Name	Alison Walker
Organisation Details	Associate Director of Strategic/Large Projects Thakeham Homes
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<ul style="list-style-type: none"> As a developer that is at the forefront of targeting zero carbon on all its developments from 2025, Thakeham supports the Council’s general approach to making the Borough carbon neutral by We do however suggest a tweak to Policy DM23 - under Item <p>1 a. the policy states:</p> <p><i>“For all new major residential development,</i></p>

- 1 *an energy performance standard equivalent to at least 19% carbon emissions reduction on the Dwelling Emission Rate (DER) against the Target Emission Rate (TER) based on Part L of the Building Regulations (2013) whilst meeting the Target Emission Rate (TER) solely from energy efficiency measures as defined within the SAP calculation model”.*
- Thakeham is of the view that this target should be updated to 31% in line with the Future Homes Standard in order to future proof policy so that it is robust and does not need to be reviewed in the short-term.
 - Whilst Thakeham supports the Council’s general approach to detailing a policy which sets out mitigation for the impacts of climate change, we question the suitability of item 3. c. in the policy *“Incorporate green infrastructure to sequest carbon, to include two or more new trees (a tree shall be considered to count if it ordinarily reaches a mature height of 6 metres or more) per dwelling or per 100 sq m floor space (for non- residential developments) on-site.”*
 - Thakeham queries whether this policy conflicts with policy DM11, which seeks to set minimum housing densities, as increasing the number of dwellings on a site reduces the land available for tree planting. Thakeham is of the view that focussing on quality, location, and species of the tree is likely to deliver better results than focussing on quantity. We would question how the landscape design of a smaller scheme would work – for instance, if it was required to deliver 100 trees on a development of 50 homes. Thakeham believes more achievable targets for example ‘like-for-like’ replacement on all trees required to be removed for development, one new tree per dwelling or a specified percentage in line with achieving Biodiversity Net Gain would be more appropriate mitigation options. Thakeham supports a target of achieving at least a 10% Biodiversity Net Gain on all new housing sites.
 - Thakeham also notes that item 4. c of the policy states *“Deliver an overall net- biodiversity gain and positive measures to support wildlife”*. Thakeham is of the view that this item should be updated in line with Policy DM30 ‘Biodiversity Net Gain’ which requires a 10% biodiversity net gain to be achieved and
 - In addition, Item 4. d states *“Use permeable ground surfaces”* however Thakeham would like to request that flexibility is added into the policy wording as permeable surfaces are not always a suitable option due to site-specific ground conditions and/or sites with limited area for surface water attenuation.

Included files

Title

Climate Change and Sustainability

ID	EGS15605
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 * No	Yes
Climate Change and Sustainability comment	<p>Section 17 Climate Change and Sustainability</p> <p>A new general policy (SP10) seeks to actively pursue the reduction of carbon dioxide emissions and many measures to achieve this are included. One of these is a presumption in favour of developments that result in a modal shift in transport, i.e., a move away from car and train journeys to walking and cycling. However this policy has failed to take account of the advantages of home working in connection with a move away from car journeys etc. and the expected long term shift in this. Another advantage of home working is that it helps to support local services and enhance or maintain the vitality of rural communities.</p> <p>A very recent analysis by economists at KPMG identifies the extent to which a shift towards home working will become permanent after the pandemic. A reduction in the flow of commuters into towns and cities by between 10 per cent and 27 per cent on pre-Covid levels is expected. In Hemel Hempstead around 27% of jobs are expected to be carried out from home. This compares with an existing figure of just under 4.5% according to the Dacorum Settlement Profiles Paper. Wigginton currently has just under 12% which is typical of other Dacorum villages.</p> <p>However, one surprising omission in the new Local Plan is any policy to deal with the planning consequences of the expected rise in home working despite mention of the current pandemic. There has already been a general rise in outbuildings for home offices and extensions for this purpose. Whilst these would often be classified as Permitted Development some would be considered business use. Consent was fairly recently given to a 4 bedroom house in Wilstone with a single storey side extension classified as Class B1 (business use). This was possible as employment uses are permitted in Wilstone, Long Marston and Aldbury but not in Wigginton, Patten End, Flamstead or Chipperfield.</p>

Included files	
Title	Climate Change and Sustainability
ID	EGS15642
Person ID	1271974
Full Name	EMILY FORD
Organisation Details	SENIOR PLANNER
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	<ul style="list-style-type: none"> • We support the emphasis on sustainable design and agree that sustainability should be integral to development • However, there is potential for sustainable design measures to impact upon the viability of development; as such, we recommend that the cumulative impact of the proposed sustainability policies on viability is tested as part of the preparation of the Local • Moreover, it is recommended that the reference in paragraph 28 to the expectation that targets will be met subject to viability (our emphasis) is added to the wording of Policy DM23 itself. • In relation to carbon emissions reductions, we consider that the Plan should be consistent with Building Regulations unless any departure can be robustly justified. Moving forward, the Plan should also seek to ensure consistency with any new national initiatives and standards which may come into force during its preparation, for example Future Homes Standards. • We recognise that the creation of community heat or energy networks or connecting to existing decentralised networks where available offers the potential for reduced carbon. However, not all Growth Areas will be able to viably support decentralised networks, dependent on a number of inter-related factors including the scale of

development proposed, and it is therefore vital that the viability, and feasibility, of delivery is taken into account when reviewing the energy strategies proposed for development sites.

- To provide clarity to developers on likely carbon offsetting contributions, we recommend that the monetary value ascribed to CO2 is specified within the
- We note that details of how the carbon offset fund will be used is due to be set out in the Dacorum Climate Change and Sustainability SPD (paragraph 17.45). We welcome this transparent approach and recommend that details are provided about the anticipated reduction in carbon emissions to demonstrate that the measures delivered by the fund will make a positive contribution to sequestering carbon, reducing carbon emissions and/or reducing the demand for fossil fuel powered

Included files

Title Climate Change and Sustainability

ID EGS15651

Person ID 1271978

Full Name JOANNA HARLEY

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Climate Change and Sustainability comment

Construction and Design – *zero carbon standards and resilience built in*

All housing must be built to zero carbon standards. Although we recognise that ‘zero carbon’ will incorporate more than the measures outlined below, we nevertheless wish to draw attention specifically to the following:

- 1 We would prefer to see maximum density housing in some areas with the specific purpose of also maximising community spaces as referred to above and

- 1 All power and heat to be sourced from renewables and provision of renewably sourced district heating/combined heat and
- 1 Rainwater harvesting and use of grey
- 2 Technologies to maximise clean water use efficiency – with objective of achieving Waterwise standard of 100 litres per day as a
- 3 Biodiversity offset as a fundamental condition of
 - 1 The use of trees and natural habitat to carbon offset, reduce flooding and protect against high summer temperatures.
- 4 The use of hedges and wildlife corridors to promote native species and provide
 - 1 Green rooves to attract insects, butterflies etc and to improve thermal efficiency and water run-off.
 - 1 Where parking is unavoidable, provision should be made underground or in shared home- specific facility away from the dwellings. The principle is to reduce space given over to personal parking and consolidate in one area, allowing streets for freedom of children, pedestrians and cyclists and to enhance quality of life.
 - 2 High standard, accessible bike storage.

Included files

Title Climate Change and Sustainability

ID EGS15717

Person ID 1273151

Full Name Ms Megan Green

Organisation Details Senior Planner
Thakeham Homes Ltd

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

Items 1 and 2 under Policy SP10 state that “All development is required to mitigate and adapt to climate change and to actively pursue the reduction of carbon dioxide emissions.” and “The policy will be applied to ensure that all new development in the Borough is net zero by 2030.”

Thakeham supports the Council’s decision to declare a climate change emergency in July 2019 and supports its commitment to take action to make the Borough carbon neutral by 2030, 20 years before the Government’s Target.

Thakeham builds for the future, for communities and for individuals. Our approach sets us apart from our competitors. We deliver our 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. We have committed that by 2025, every Thakeham home will be Zero Carbon in lifetime operation.

Included files

Title Climate Change and Sustainability

ID EGS15719

Person ID 1273151

Full Name Ms Megan Green

Organisation Details Senior Planner
Thakeham Homes Ltd

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Climate Change and Sustainability comment

As a developer that is at the forefront of targeting zero carbon on all its developments from 2025, Thakeham supports the Council’s general approach to making the Borough carbon neutral by 2030. We do however suggest a slight adjustment to Policy DM23 - under point 1a the policy states;

“For all new major residential development,

- 1 an energy performance standard equivalent to at least 19% carbon emissions reduction on the Dwelling Emission Rate (DER) against the Target Emission Rate (TER) based on Part L of the Building Regulations (2013) whilst*

meeting the Target Emission Rate (TER) solely from energy efficiency measures as defined within the SAP calculation model”.

Thakeham is of the view that this target should be updated to 31% in line with the Future Homes Standard in order to future proof policy so that it is robust and does not need to be reviewed in the short-term.

Whilst Thakeham supports the Council’s general approach to mitigating for the impacts of climate change, we have concerns over point 3c in the Policy, namely to;

“Incorporate green infrastructure to sequest carbon, to include two or more new trees (a tree shall be considered to count if it ordinarily reaches a mature height of 6 metres or more) per dwelling or per 100 sq m floor space (for non-residential developments) on-site.”

This policy could conflict with Policy DM11, which seeks to set minimum housing densities, as increasing the number of dwellings on a site reduces the land available for tree planting.

Thakeham is of the view that focussing on quality, location and species of the tree is likely to deliver better results than focussing on quantity. We would further question how the landscape design of a smaller scheme would work – for instance, if it was required to deliver 100 trees on a development of 50 homes. Thakeham believes more achievable targets for example ‘like- for-like’ replacement on all trees required to be removed for development, one new tree per dwelling or a specified percentage in line with achieving Biodiversity Net Gain would be more appropriate mitigation options. Thakeham supports a target of achieving at least a 10% Biodiversity Net Gain on all new housing sites.

Thakeham also notes that item 4. c of the policy states “Deliver an overall net-biodiversity gain and positive measures to support wildlife”. Thakeham is of the view that this item should be updated in line with Policy DM30 ‘Biodiversity Net Gain’ which requires a 10% biodiversity net gain to be achieved and managed.

In addition, Item 4. d states “Use permeable ground surfaces” however Thakeham would like to request that flexibility is added into the policy wording as permeable surfaces are not always a suitable option due to site-specific ground conditions and/or sites with limited area for surface water attenuation.

Included files	
Title	Climate Change and Sustainability
ID	EGS15749
Person ID	1269277
Full Name	DEFINE PLANNING AND DESIGN LTD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Climate Change and Sustainability comment	<p>POLICY SP10 – CLIMATE CHANGE MITIGATION AND ADAPTATION:</p> <p>BHL recognises the importance of adapting to climate change, but notes that the requirement for developments to be net zero from 2030 (having been required to achieve an energy performance standard equivalent to at least 19% carbon emissions reduction and to achieve a further 20% reduction in residual carbon emissions prior to 2030) is particularly aspirational and would increase development costs. Therefore, DBC must produce a viability assessment that considers the viability implications of this policy requirement alongside the plan’s other costs on various site typologies to ensure that the policy does not render developments unviable (Ref. 10-002-20190509).</p> <p>In addition, the requirement for all developments to “<i>actively pursue</i>” the reduction of carbon dioxide emissions is ambiguous and not enforceable. To be “clear and unambiguous” in accordance with NPPF paragraph 16d, this requirement must be quantifiable to ensure consistent application of this policy when determining planning applications.</p> <p>POLICY DM22 – SUSTAINABLE DESIGN AND CONSTRUCTION:</p> <p>BHL supports the principle of Policy DM22 and the importance of sustainable design and construction. However, NPPF paragraph 16d states that policies should be clear and enforceable, “<i>so it is evident how a decision maker should react to development proposals.</i>” However, the policy’s current wording is ambiguous in many instances. Indeed, the requirements for proposals to demonstrate “<i>the highest standards of sustainable design</i>”, “<i>minimise building construction waste, reduce the volume of construction waste going to landfill</i>” and “<i>create a ‘future proofed’ design</i>”, amongst others, are open to interpretation, meaning their application could be inconsistent between planning applications. As such, an audit of the policy should be carried out.</p> <p>Policy DM23 - Energy and Carbon Emissions Reductions in New Development</p>

BHL recognises the importance of achieving reductions in energy and carbon emissions. However, whilst Policy DM23's requirement for new development to achieve a further 20% reduction in residual carbon emissions above and beyond the extant Building Regulations is aspirational, a Viability Assessment is required to demonstrate that this policy requirement, when taken into consideration alongside the requirements of the plan as a whole, would not render allocation sites unviable.

Policy DM24 - Low Carbon Community Heat and Energy Networks

Figure 6 of Policy DM24 shows the 'areas of opportunity' for wind turbines and district heating; of which allocations HH01 and HH02 are located within the former. BHL, however, questions the suitability of this location to accommodate wind turbines given the potential impacts on the Chilterns AONB, as well as the Country Park and Suitable Alternative Natural Green Spaces (SANGS) that are required as part of the development of allocations HH01.

In any case, requirement 1a requires Growth Areas to “*create a site-wide community heat or energy network.*” Whilst the provision of that network is supported, a comprehensive approach to delivering a low energy network across HH01 and HH02 would be more efficient (in energy and financial terms) than delivering phased networks. Such an approach justifies the allocation of both sites, which is advocated for numerous reasons in BHL's responses to Questions 4 and 5 below.

Included files	
Title	Climate Change and Sustainability
ID	EGS15758
Person ID	1271978
Full Name	JOANNA HARLEY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Climate Change and Sustainability comment	We welcome in particular the Topic - Climate Change and Sustainability and many of the comments included with these policies. Para 17.9 refers to NPPF Chapter 14 <i>“17.9 – Plans should be proactive in mitigating and adapting to climate taking into account a number of impacts including flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures (paragraph</i>

149) *The policies of the plan should support appropriate measures to ensure the future resilient of communities and infrastructure to climate change impacts.”*

Water supply in this area is constrained being supplied by the local aquifer which also feeds our Chalk Streams. The Environment Agency tells us that abstraction is to be restricted to ‘current’ levels. This poses a challenge to the Infrastructure Plan and is a critical aspect of the proposal to increase dwelling numbers by over 20% in this locality. We comment further in Q6 Sustainability Appraisal. Aside from ‘climate change’, with reduced rainfall, Residents will need assurance that the water supply is not threatened by the increased numbers.

We note **SP10 Climate Change Mitigation and Adaptation** applies primarily to new development. We are pleased that existing stock is not forgotten as policy 3.1 applies viz:

“i – supporting retrofitting schemes to the existing building stock to meet higher energy efficiency standards.”

The Plan makes references to the Borough’s Climate Change Strategy: we commend its ambition as set out in Para 17.24 and 17.25 on non-residential development

“17.24 – While the Government has signalled its intent to introduce a ‘roadmap’ to reducing greenhouse gas emissions to net-zero by 2050 – to include the Future Homes Standard 2020 and further measures from 2025 for new homes to produce 75%-80% lower CO2 emissions and be ‘zero carbon ready’ – our Plan accelerates this change. Our initial energy efficiency standards for new residential development are set at exceeding the Building Regulations Part L 2013 by a further 19% in terms of CO2 reductions on the Target Emission Rate (TER). This is the equivalent of the withdrawn Code for Sustainable Homes Level 4 and complies with the provisions of the Planning and Energy Act 2008. In addition we will seek contributions towards a further 20% reduction, leading to all new development being carbon neutral from 2030.

17.25 – The Plan expects new non-residential development (where local authorities are not restricted or limited in the setting of energy performance standards) to achieve a BREEAM standard of Excellent.”

This is set out in:

“Policy DM23 – Energy and Carbon Emissions Reductions in New Development”

We also note the several statements and Policies relating to Community Heat and Energy Networks. These are an improvement on previous policies which have never found acceptance by developers in this Borough. Nevertheless, the Policies DM24/25/26 should be retained.

Included files

18 Environment and Biodiversity responses

Title	Environment and Biodiversity
ID	EGS5
Person ID	1253642
Full Name	F Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Regarding Item 18 Environment and Biodiversity in relation to your proposed development of farmland at Tring. You say "all development shall help conserve, restore or enhance the prevailing quality, character and condition of Dacorum's natural and historic landscape." Building development does exactly the opposite. We humans trash the world, which was once in its entirety "an area of outstanding natural beauty." So it would be good to have some realism here. Britain is about to enter a period of great uncertainty about imported food supplies, and we should conserve local farmland for food production, not development.</p> <p>Your proposed developments will almost double the size of built-up Tring, which will be unsustainable in spite of your many stated strategic objectives and marketing evidence. You state that the natural environment is one of Dacorum Borough's greatest resources, so why destroy it?</p>
Included files	
Title	Environment and Biodiversity
ID	EGS6
Person ID	1253641
Full Name	Matt Dodds
Organisation Details	Herts and Middlesex Wildlife Trust
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>This section is excellent and covers all the most important areas. Small changes are requested to make it even more effective.</p> <p>Change the wording of DM28 slightly in order to specify the British Standard on Biodiversity and Planning BS 42020. This will ensure better information is submitted leading to clearer more definitive decisions. Suggest change to:</p> <p>'4. Evidence will be required in the form of up to date, comprehensive ecological surveys undertaken in accordance with industry guidelines and BS 42020 prior to the submission of an application.'</p> <p>BS 42020 can then be referenced in the relevant evidence and supporting guidance.</p> <p>Policy DM29 should be expanded to include buffers around priority habitats. Building right up to the edge of a priority habitat can effectively erode its value. A buffer of complimentary habitat of at least 10m, or 15m for woodland, is required to safeguard the priority habitat. Suggest adding a third point to DM29:</p> <p>'3. A minimum buffer of 10m of complimentary habitat will be required to all retained priority habitats. Woodland will require a minimum buffer of 15m.'</p> <p>18.25 The Biodiversity Metric is subject to upgrades so change the wording to:</p> <p>'18.25 We will help to protect and improve biodiversity by using a net gain metric to secure measurable gains to the environment through on site improvements, or in worst case scenarios, from commuted sums towards offsite habitat areas. Natural England has created the Biodiversity Metric calculator (version 2.0 or as amended) as a way of measuring and accounting for biodiversity losses and gains resulting from development or land management.'</p> <p>Policy DM30 - Biodiversity Net Gain</p> <p>The Environment Bill is likely to ensure that all development above householder will require a measurable net gain. This policy should be consistent with this aim but also leave some leeway for discretion should a site be of little value (i.e. urban site). Limiting to only major development may be in conflict with the Bill.</p> <p>Change policy slightly to:</p> <p>1. All appropriate development will be required to deliver an overall net gain in biodiversity of 10%, determined by applying the Natural England Biodiversity Metric Calculator (version 2.0 or as amended). Proposals should be accompanied by a "biodiversity gain plan" to explain how the 10% net gain will be achieved and managed.</p> <p>Add a third policy to ensure integrated features for wildlife are built into development as standard.</p> <p>add:</p> <p>'3. Integrated features for bats and birds should be built into all buildings bordering open space or beneficial habitats.'</p>

Included files	
Title	Environment and Biodiversity
ID	EGS14
Person ID	1253652
Full Name	erica vilkauls
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Our country side needs our help to thrive and building on green field sites should NEVER happen. Please refer to our MP who supports my view. The land we lose we will never get back and for what? The Governments' egotistical plan to pave over the south's beautiful countryside
Included files	
Title	Environment and Biodiversity
ID	EGS52
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Policy DM27/ DM29/DM36 <i>for the community to have a significant say in its location and specification expectedexpected expected</i>

Included files	
Title	Environment and Biodiversity
ID	EGS108
Person ID	1254846
Full Name	James Martin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The CAONB was identified in the HS2 works as being of great significance. These proposals take away significant amounts of green belt land in the same areas.
Included files	
Title	Environment and Biodiversity
ID	EGS176
Person ID	1257687
Full Name	Elizabeth Cullen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Concern regarding the impact of an increased population on the Tring Woodlands SSSI. Dog owners are not all considerate users of the site and this will be exacerbated by an increased population. It is already very busy at weekends.

Included files	
Title	Environment and Biodiversity
ID	EGS260
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Preservation of our chalk downland, our woodland and our chalk streams has to be given the highest priority.
Included files	
Title	Environment and Biodiversity
ID	EGS324
Person ID	1259852
Full Name	Imogen Wagstaff
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Building on the green belt around the Chilterns AONB is not compatible with preserving the wildlife and ecosystems of this area. Wildlife corridors are very important and we need to be increasing, not decreasing these areas. Commitment must be made to rewilding in more areas to increase biodiversity in the area.

Included files	
Title	Environment and Biodiversity
ID	EGS375
Person ID	1260058
Full Name	Redbourn Parish Council
Organisation Details	
Agent ID	1260042
Agent Name	David Mitchell
Agent Organisation	Redbourn Parish Council
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	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.
Included files	
Title	Environment and Biodiversity
ID	EGS439
Person ID	1260485
Full Name	Nick Bowles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment

18.3 I want to see clear and unambiguous plans that state how you intend to join up and expand existing areas with reasonable biodiversity. You are planning roads to link settlements and housing with other infra-structure. You must also give clear plans for the way that you will link the rich areas around Ashridge with those to the west of Tring and Northchurch. There must be plans to improve biodiversity along the canals and railways through DBC, as both have great potential to be wildlife corridors. When the A41 from Tring to Watford was built it was to be the longest nature reserve in Britain. Why is there no plan to restore the habitats that were originally planned for the verges along this route?

18.5 Biodiversity and conservation must form part of the planning stage - the NPF says they should be integral. Despite chalk grassland in DBC being one of the richest and rarest habitats in the world (not just in the UK) there is no recognition of its importance - only of Beech woodland which is pretty but relatively lacking in biodiversity.

The Dacorum Green Infrastructure plan notes:*It has a number of strategically significant and historic green infrastructure assets, such as the Ashridge Estate, Tring Park, the Marsworth Reservoirs complex and the Grand Union Canal.*

I can see no reference to the way that these will be enhanced as the law requires. Indeed the entire plan appears to be based upon building inbetween these acknowledged richest sites. The Environment Bill will restate the need to join up these remaining biodiverse sites yet the DBC Local Plan is suggesting that it will separate them further by inserting large blocks of urban landscape on green belt between them.

18.12 The *Chilterns AONB Management Plan 2019 – 2024: Caring for the Chilterns forever and for everyone* clearly states that: *In the AONB the planning priorities are conservation and enhancement of landscape and scenic beauty, and the conservation of wildlife and cultural heritage (see the National Planning Policy Framework³⁵, paragraph 172). Whilst nationally there is a need for development, there is also a need to protect the most special places, the finest and most beautiful parts of the countryside. This is particularly true for the Chilterns, an irreplaceable green lung for London and the south east.*

There is no evidence that this imperative has been taken on board.

Included files	
Title	Environment and Biodiversity
ID	EGS461
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS523
Person ID	1260809
Full Name	James Mac
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Building over green belt land should be a last resort when all other options across the whole of the UK have been exhausted. We are nowhere near that point yet with huge amounts of land still available. Only organic small housing numbers should be built for foreseeable future.
Included files	
Title	Environment and Biodiversity
ID	EGS559
Person ID	1260936
Full Name	Peter Hadden
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>The Dacorum Plan states at 18.4 Water resources are under extreme pressure from the use of groundwater for water supply and from climate change.</p> <p>How is the water supply going to be enhanced to support the massive number of new houses proposed? In Potten End and parts of Berkhamsted (at least) the taps ran dry on a number of occasions in the dry summer of 2018.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS571
Person ID	1261023
Full Name	Richard Brash
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<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.</p> <p>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>
Included files	
Title	Environment and Biodiversity

ID	EGS605
Person ID	1261122
Full Name	Mark Slade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS632
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity 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.

Title	Environment and Biodiversity
ID	EGS655
Person ID	1258939
Full Name	Ed Shedd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>18.2 - Agree with the intent. The Local Plan does not address this, with the exception of a 10% increase in biodiversity in e.g. the Hemel Garden Communities. How can we be confident that the policy will inform the plan's implementation? We need more specifics as to how this Local Plan will implement against the new laws due to be passed in 2022.</p> <p>18.4 - Totally agree with the importance of urban green infrastructure, which is why it is heartbreaking to see the lack of detail in the local plan for this. Does it really factor in green spaces into the development of all the new communities proposed?</p> <p>18.5 "The duty aims to make biodiversity conservation an integral part of policy and decision making." And yet the Local Plan makes only scant reference to this, even when addressing the housing which is using green belt land. There is a target e.g. 10% increase in biodiversity, but little else of tangible import. The target itself is too low. England is a country with one of the lowest levels of biodiversity in the world. The lack on ambition on show is evident and worrisome.</p> <p>18.7 - We are using a Biodiversity Action Plan written in 2006? A document that is 15 years old? That almost beggars belief, and surely I must simply be mistaken? In writing the Local Plan, there should have been a new Biodiversity Action Plan. Which can be used to inform the detail of the initiatives and targets which need to be set and delivered against over the course of the plan.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS679
Person ID	1261232
Full Name	Mark Burrage
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Policy DM30 - Biodiversity Net Gain is supportedAn additional policy should be included either in this section or sustainability. for Publicly Accessible Green Space. All major development should be required to demonstrate how they will increase the overall availability of publicly assessible green space.</p> <p>http://publications.naturalengland.org.uk/publication/65021 provides guidance on how to do this though the policy should not be linked to protected areas merely the overall availability of natural green space.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS689
Person ID	1249904
Full Name	Mrs Christine Ridley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>As before, although there are many admirable aims in this section, the actual plans do not seem to reflect the aims set out.</p> <p>For example, the plan states:</p> <p>18.1 <i>The natural environment is one of the Borough's greatest resources and encompasses the landscape of the countryside and green infrastructure(13) within towns and villages, helping to give Dacorum its strong sense of place.</i></p> <p>Why then, is the council planning to build the majority of the new houses on the Green Belt?</p> <p>Policy DM27 - Landscape Character and Chilterns Area of Outstanding Natural Beauty'</p>

All development shall help conserve, restore or enhance the prevailing quality, character and condition of Dacorum's natural and historic landscape.

Building houses all along one side of the Gade valley as part of the Garden Community project, will do the opposite. It will ruin the visual aspect of the valley, impinge on old farm buildings and historic settlements such as Piccotts End and Water End, and also affect adjacent ancient woodland.

Although the draft plan states:

18.23 *'For development to be sustainable, improvements to the environment and biodiversity must be delivered alongside new homes and infrastructure. National planning policy sets out principles for protecting biodiversity from harm, including the use of a mitigation hierarchy i.e. avoidance, mitigation and then compensation. Local planning authorities have a Biodiversity Duty under the NERC Act 2006 and guidance provided NPPF (paragraph 170 (d) and 174 (b)) to seek enhancements and a net gain for biodiversity from development. In 2020, new national planning policy is expected to make it mandatory for development to deliver a 10% biodiversity net gain',*

I have failed to find any mitigation plans in the draft local plan. Where is detailed and well thought out plan to accompany the vision for a more biodiverse landscape in Dacorum?

I find it difficult to understand how the developers are going to provide habitat for the Skylarks, Linnets, Yellowhammer and Brown Hare, which currently live and breed in the Gade valley in the area of the proposed Garden Community. All of these bird species are on the **RSPB Red list** and are farmland birds that do not inhabit gardens or parks and would be deprived of their breeding areas as a consequence of the building.

Furthermore, although 18.24 states:*Development should be designed around existing components of the ecological network, and seek to improve, enhance and connect these features with the wider network (NPPF paragraph 174).*

Developers are refusing to make a proper Wildlife corridor in Local Allocation 3, in spite of recommendations from Martin Hicks, the ecological advisor to Hertfordshire, that there should be such a corridor to join Shrubhill Common Local Nature reserve to the wider countryside. The proposed aims need 'teeth' in order to ensure they are actually realised, otherwise they are just words on a page that don't amount to anything in the real world.

18.25 states: *We will help to protect and improve biodiversity by using a net gain metric to secure measurable gains to the environment*

I am wondering exactly how and when the above biodiversity will be measured, as I would be very interested to read the results. Is this binding? As I have explained above, I would argue that this is impossible to achieve, due to the complete change of landscape which would result from the proposed developments.

With regards to woodlands we are advised by scientists at the Royal Botanic Gardens, Kew:

“Tree planting is a brilliant solution to tackle climate change and protect biodiversity, but the wrong tree in the wrong place can do more harm than good”, say experts at the Royal Botanic Gardens, Kew.

The 10 golden rules are:

Protect existing forests first

Keeping forests in their original state is always preferable; undamaged old forests soak up carbon better and are more resilient to fire, storm and droughts. “Whenever there’s a choice, we stress that halting deforestation and protecting remaining forests must be a priority,” said Prof Alexandre Antonelli, director of science at RGB Kew.

(Quotes from BBC news article 23rd Feb 2021)

We shouldn’t, therefore, think that it’s fine to chop down existing ancient woodland as long as trees are planted elsewhere to compensate.

The Guardian today (Tues 2nd Feb 2021) in an article about a review commissioned by the UK treasury, reports:

“The world is being put at “extreme risk” by the failure of economics to take account of the rapid depletion of the natural world and needs to find new measures of success to avoid a catastrophic breakdown, a landmark review has concluded”.....

“The British prime minister, Boris Johnson, who will host the UN climate summit in Glasgow in November, said: “This year is critical in determining whether we can stop and reverse the concerning trend of fast-declining biodiversity. I welcome the review, which makes clear that protecting and enhancing nature needs more than good intentions – it requires concerted, coordinated action.”

Humanity’s impact on the natural world is stark, with animal populations having dropped by an average of 68% since 1970 and forest destruction continuing at pace – some scientists think a sixth mass extinction of life is under way and accelerating. Today, just 4% of the world’s mammals are wild, hugely outweighed by humans and their livestock.”

“Sir David Attenborough said the review was “immensely important”. In a foreword, he said: “If we continue this damage, whole ecosystems will collapse. That is now a real risk. The review at last puts biodiversity at the core [of economics]”

We should be finding ways to **improve the quality of our green spaces, (including farmland)** for wildlife instead of building all over them.

In the section: **Policy DM33 - Protection and Enhancement of the River Character and Water Environment** : the aim to ‘*avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments*’ is very welcome.

However, as there is no national water strategy in this country, the above assurance is meaningless. As soon as a house is built and inhabited, its inhabitants will begin to use water from the surroundings, and at present most of this

water is taken from the water table which directly affects our chalk streams. The water company is obliged to supply a source of water by law and the council is not responsible for where this water comes from and has not told us in this plan where the water company intends to get the water.

So how can we believe policy DM33?

Chalk streams are a globally rare and special habitat, but the draft Local Plan specifies no plans to enhance and improve the quality of our local chalk streams, which are currently classed as being of low quality. Currently in times of high rainfall, excess water from farmland and roads can flow into our chalk streams through outflow channels, thus increasing the nutrient levels and lowering the water quality.

What is more, currently the sewage system is already to capacity, so where are the firm plans for alternative sewage treatment works? If these are not put in place, our beautiful chalk streams could be contaminated with sewage in times of high rainfall.

I am very pleased to see that the council is planning to protect local Nature reserves:

Policy DM28 - Protection of Sites

- 1 Important nature conservation sites, habitats and sites of geological and geomorphological interest will be protected, maintained and enhanced.*

And assume this will include our Local Wildlife Site 'The Halsey Field' in Gadebridge.

Also pleasing is the statement:

18.19 *We will also seek opportunities to create new spaces for nature conservation, such as informal green infrastructure managed for biodiversity benefit, or Local Nature Reserves (LNRs).*

Included files

Title Environment and Biodiversity

ID EGS715

Person ID 1261251

Full Name Lesley Ashden

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	See previous comments
Included files	
Title	Environment and Biodiversity
ID	EGS740
Person ID	1261250
Full Name	Christina Thompson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The proposals for the destruction of green belt land and farms runs counter to environmental and biodiversity characteristics of our rural towns.
Included files	
Title	Environment and Biodiversity
ID	EGS751
Person ID	211245
Full Name	Ms Jody Conibear
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	As per my previous comment, the strategy is admirable and sets bold statements but I have absolutely no belief that these intentions will be implementable when we are building on swathes of ancient greenfield pasture and on the foot of the Ridgeway as proposed in the vast Tring expansion. These areas are currently flourishing with resident and migratory wildlife and huge biodiversity offered by our Nationally recognised chalk downs. It is unrealistic to expect to bring so many new homes and inhabitants to this greenfield space and maintain (or improve) the current environment.
Included files	
Title	Environment and Biodiversity
ID	EGS775
Person ID	1261271
Full Name	Austin Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>My comments specifically relate to Tring and surrounding areas</p> <ol style="list-style-type: none"> 1 No Biodiversity studies have been undertaken since 2011, hence how can the new local plan be well informed and robust. No robust evidence base. 2 Linked to the lack of a biodiversity baseline it is unlikely that ecosystem services have been taken into account. To be in live with the NPPF this will be required. 3 The area east of Grove road in biodiversity terms is a relatively rich landscape despite its agricultural use, this is due in part to the number of woodland strips, hedgerows that bisect the site. 4 Based upon comment 3 (that despite the agricultural use both the Grove road site and other sites in Tring have significant biodiversity value) I fail to see how Biodiversity Net Gain, a requirement as part of the Environment Bill, can be delivered on the proposed development areas. 5 I have not seen that an 'Appropriate assessment for plans' has been undertaken in respect of the Chilterns Beechwoods SAC (Special Area of Conservation)

Included files	
Title	Environment and Biodiversity
ID	EGS793
Person ID	1260046
Full Name	Jude Jackson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>The previous white paper obviously was a complete waste of time. Our biodiversity is the worst in Western Europe and increased building will add to this decline.</p> <p>We need to allow corridors of green natural spaces to allow wildlife to prosper. Green spaces should not just be parks for people. We need places where wild flowers and the insects that are so vital to our survival can thrive. We need to preserve mature trees as well as planting new ones.</p> <p>I regularly go litter picking and am appalled at how much rubbish is discarded by people out 'enjoying' our wonderful local areas. This will only increase with such a substantial increase in the number of people accessing these places.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS827
Person ID	1260562
Full Name	DAVID WILDE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Environment and biodiversity: I would like to see a rule that existing hedgerows must be retained, as wildlife corridors.
Included files	
Title	Environment and Biodiversity
ID	EGS834
Person ID	1207613
Full Name	Ms Nina Crabb
Organisation Details	Planning Adviser The National Trust
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>The National Trust is pleased that the impact of the proposed housing growth on the Chilterns Beechwoods SAC is being assessed and that the impact it will have on the Ashridge Estate is recognised. The National Trust is grateful to Dacorum Borough Council for proactive engagement with the NT on these matters.</p> <p>18.17 - Can't see the Chilterns Beechwoods SAC on the Policies Map</p> <p>Policy DM28 - Title of policy not clear/linked to theme. A better option might be 'Designated Biodiversity and Geodiversity Sites'.</p> <p>Policy DM28 (2) - "Development proposals which are likely to cause harm..." how will this be assessed?</p> <p>18.29 It is difficult to manage access to the SAC at the National Trust Ashridge Estate due to its status as common land Access Land under the CROW Act.</p> <p>18.32 The National Trust owns land within the Ashridge Estate (and beyond it). It clearly provides an important area of recreational space for a significant population within the local catchment area but also draws visitors from farther afield. At times the visitor infrastructure struggles to cope with visitor numbers. The National Trust is extremely concerned about the level of housing which Dacorum Borough Council is proposing in new Local Plan. The scale of growth planned</p>

would certainly increase visitor numbers at the Ashridge estate and this could pose a threat to the recognised nature conservation interests. The NT foresees a potentially significant impact upon the green infrastructure and designated features at Ashridge. It is important that the impact of the proposed development growth is assessed through the Habitats Regulations Assessment as part of the emerging Local Plan.

We strongly support the conclusion that an Appropriate Assessment is required in order to examine the impact of recreational disturbance on the Ashridge Commons and Woods SSSI component of the Chilterns Beechwoods SAC.

18.34 - Unable to find the Chilterns Beechwoods On-Site Access Management Strategy or the Environment and Biodiversity Topic Paper.

Policy DM31 -

1. "all relevant development proposals" - this needs to be defined.
2. Who will determine if there are grounds to believe the SAC will be affected by proposed development? This needs to be established pre-application so that the necessary assessment/plans/mitigation can be submitted with the planning application. These need to inform the application. Otherwise it will cause delays in the application process. Applicant's will need to provide sufficient information to enable the LPA to carry out a Habitats Regulations Assessment.
3. The National Trust strongly supports this policy. The provision of on-site open space, SANGS (including destination open space such as a country park) and contributions towards the management of the SAC will help reduce recreational pressure and damage to notified features on the Ashridge Estate.

The National Trust considers that the recreational pressure at the Ashridge Estate could be addressed through planning policies in the Local Plan as follows:

- 1 Alternative high quality natural/semi-natural greenspace is provided on site for all new major residential developments.
- 2 A destination site such as a new country park is provided (between the growth areas and Ashridge on undesignated land of low conservation value) which offers a multifunctional space with a range of facilities as an alternative to Ashridge. This needs to be close enough to Ashridge to divert pressure away from the SAC and delivered early in the plan period.
- 3 A contribution for monitoring and mitigation from new housing developments within an established Zone of Influence to address residual impact. The policy should be linked to a charging schedule.

Without these measures it is predicted that adverse impacts on the Ashridge Estate from increased recreational use due to an increase in housing within the District will continue.

The Access Management Strategy Scheme and SPD need to be prepared and adopted at the same time as the Local Plan otherwise it will be difficult to secure financial contributions. What will happen if they are not in place?

How will financial contributions be determined? Will there be a tariff?

Mitigation needs to be in place prior to the occupation of any new dwellings.

3.a.i. The NT would be happy to be involved in the development of an SAC Site and Access Management Strategy/SPD.

3.a.iii How will a 'meaningful proportion' be determined?

5. When and how will the zone of influence be determined?

Policy DM32

The National Trust supports the inclusion of this policy which will help protected the notified species within the Estate.

2. Instead of 'Support will be given to proposals which seek to re-introduce historic uses, feaures or field patterns', the National Trust's preference would be 'Support will be given to proposals which seek to enhance the ecological and historical features of the Estate, including through the re-introduction of historic land use practices'.

Included files

Title Environment and Biodiversity

ID EGS847

Person ID 1261436

Full Name SALLY MARSTON

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

Environment and Biodiversity comment This is all despite the environmental impact of such a large development on an area which leads up to Ivinghoe Beacon, Ashridge Woods, etc which are of great value to the health and well-being of all the local residents. Marshcroft Lane is not named as such for no reason. If you walk down there at the moment the fields on either side are flooded. This can only be exacerbated by large areas of building and concrete surfaces.

Included files

Title Environment and Biodiversity

ID EGS989

Person ID 1260803

Full Name Rollo Prendergast

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>18.39 Protection and Enhancement of the River Character and Water Environment</p> <p>CPRE, in their assessment of the Local Plan, has observed:</p> <p>'The level of new housing proposed will put a severe strain on water supplies in the Dacorum area especially during dry summer months. Until new water supplies are available from elsewhere in England, which will not be until the 2030s, the only option would be to extract additional water from the chalk aquifer which in turn would damage the borough's chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. The proposed plan as presented is largely silent on new sources of water supply and on how it will protect the three designated chalk streams in the borough (the Gade, Bulbourne and Ver). 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.'</p> <p>- What therefore are the implications of 1,023 dwellings per year being built 2020-2038, and increase of 50% over Scenario 2 above?</p> <p>- Has the use of water (and its treatment) during the construction of these dwellings been taken into account: the use by 'wet trades' (concrete, cement and mortar as well as site maintenance)?</p>
Included files	
Title	Environment and Biodiversity
ID	EGS1004
Person ID	1261648
Full Name	Colin Cartwright
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>My other main concern is to do with ensuring sufficient green space in areas of new development. There appears to be no commitment to providing a particular proportion of 'green space' and woodland compared to land that will be built on. Any plans for urban spaces, like the original garden community plan for Hemel, need to ensure there is plenty of land in between built up areas which will not be built on. There are two particular issues I want to pick out from the Local Plan in this regard:</p> <p>18.60 talks of three new trees being planted to replace any established tree which is removed to make way for re-development. This sounds good. These new trees can be planted anywhere, according to the Plan. However, three new trees do not instantly replace an established tree and will destroy a whole range of biodiversity which depended on the original tree. The new trees are not guaranteed to survive (quite a high proportion of planted trees can die quite early). And even if they do, it will likely take many years before the new trees are producing as much oxygen as the established tree. And many years before they have secured as much carbon as the established tree. Numerical multiplication of trees is not, unfortunately, an instant answer to the problems of new development, nor proof that this Plan is 'tackling Climate Change'.</p> <p>18.66 talks of wildlife 'stepping stones' between green spaces. However, there is little detail here of the distance between these so-called 'wildlife stepping stones', nor their size. What is needed, according to the RSPB and all other nature conservancy groups, is not 'stepping stones' but full wildlife corridors. This is for the sake of local wildlife and also for the sake of the mental health of the residents of these new developments.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS1128
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS1164
Person ID	1261837
Full Name	Kimberley Bond
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	"The natural environment is one of the Borough's greatest resources" You are paying lip service to this statement. The scale of growth you are proposing will have significant negative effects on the natural environment in the borough, from the surrounding countryside to the Grand Union Canal and waterways which run through our towns and villages. The increased pollution from heavier traffic, on a road network that is not designed to cope with a significant increase in the population will all significantly impact the environment and biodiversity in the region.
Included files	
Title	Environment and Biodiversity
ID	EGS1242
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Section 18 'Environment and Biodiversity' (Pages 112-132)</p> <ul style="list-style-type: none"> Tring is surrounded by AONB and Green Belt countryside. This natural environment of outstanding beauty deserves and needs an outstanding design, including an excellent green infrastructure for the housing developments east of Tring, Tr01, Tr02 and However, despite admirable, and welcome, aspirations on comments such as 18.1 and 18.11, TinT can find little evidence that the Plan includes positive action on green infrastructure. For example, Section 18.19 states, '<i>We will also seek opportunities to create new spaces for nature conservation, such as informal green infrastructure managed for biodiversity benefit, or Local Nature Reserves (LNRs).</i>' Before pressing ahead with Green Belt development there should be clarity on how this aspiration will be met – whether as reserved areas with Tr01 Tr02 and Tr03 or in the surrounding land, as required by NPPF paras 147, 99/100.
Included files	
Title	Environment and Biodiversity
ID	EGS1267
Person ID	1261930
Full Name	Chris Gee
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Tring sits surrounded and nestled within the Chiltern Hills. The town is visible from many of the local hills around and visually "fits" into the landscape in a considered way. The addition of c2300 new properties clustered together at the end of the town will negatively impact the local setting and environment. The Dacorum local plan will not protect the natural local environment nor conserve and enhance the local existing green infrastructure.</p> <p>The citing of such a large number of new dwellings in one expansive development will result in the loss of unique hedgerows, field habitats, valued agricultural landscape and the special visual appearance of the countryside to the east</p>

of Tring. Again, taking an evidence based plot-by-plot approach has not addressed the unique beauty of this environment, nor fulfilled your obligation and responsibility to protect these environments for the enjoyment of future generations. This land to the east of Tring, together with the fields around Dunsley Farm and Icknield way border onto the Chilterns AONB; again the evidenced based approach does not allow for the citing of new dwellings adjacent to this nationally importance landscape.

The loss of this agricultural land will impact the local environment more adversely than brown field developments or any infill plots of land. It would be more responsible to consider and give more weighting to the citing of new dwellings to infill plots or those plots of land already adjacent to the town, rather than erode countryside that is well removed from the existing town.

The fields located in the east of Tring sites frequently flood in heavy winter rains, as has been witnessed many times in recent years. The citing of 2200 dwellings and associated infrastructure in these field will further impact the local flooding, as local drainage in new roads will not be able to accommodate this rainfall.

Included files

Title Environment and Biodiversity

ID EGS1280

Person ID 1145427

Full Name Mr David Glenister

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

The policies are in conflict with maintenance of the Green Belt.

Green Belt is legally afforded by the National Planning Policy Framework (NPPF). In that respect this Plan and DBC have already failed by promoting 850 hectares of Green Belt for development on the premiss that the Plan must aim for a 'target' that really is not a 'target'. All measures which protect the Environment and encourage Biodiversity are welcome, but this has to be seen against a background of significant increases in new homes and employment in the Borough. The potable water supplied to the Borough comes from aquifers. Policy DM33 makes no reference to the increased

demand for water resulting from this growth. The Environment Agency has restricted the amount of water Affinity can abstract from aquifers and Affinity's long-term plan requires significant investment and cross-country cooperation and will produce little real growth in supply to the area until after 2030. With this background DBC propose "working with partners to help restore river flows" and under Policy DM33 "avoid the need to abstract water from the ground, in particular the Rivers Ver, Gade and Bulborne catchments". These chalk streams are acknowledged as a globally rare habitat. The rivers flow through the heart of the Borough. For development to be sustainable improvements to the environment and biodiversity must be delivered alongside new homes and infrastructure. The only conclusion one can reach is that the growth proposed in this draft Plan is unsustainable development and should be rejected.

Included files	
Title	Environment and Biodiversity
ID	EGS1299
Person ID	1261957
Full Name	Jeremy Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Dacorum is already heavily developed. You have set housing targets but you have not set targets for the proportion of the Borough of Dacorum that will remain as woodland, ancient woodland, farmland. Your plan talks in specifics when it comes to housing and generalities when it comes to the environment; because you have an objective measure for housing and no objective measure for environment the environment is threatened.
Included files	
Title	Environment and Biodiversity
ID	EGS1314
Person ID	772477
Full Name	Mr. Roy Warren

Organisation Details	Planning Manager Sport England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Policy DM35: Protection from Environmental Pollution</p> <p>It is requested that an additional criterion is added to section 2 e of Policy DM35 on light pollution. The policy does not provide any policy guidance on light sensitive developments proposed in locations where surrounding existing land uses may have an adverse effect on the occupants of the development. For example, residential schemes proposed adjoining school or sports clubs sites that have floodlit sports facilities. In such scenarios, developments should submit lighting assessments including mitigation measures to address any identified impacts to help avoid residential amenity issues arising which may result in the uses that generate an impact being prejudice. Sport England has had experience of sites with established floodlit sports facilities coming under pressure to reduce the hours of use that the floodlighting operates in response to complaints from residents in new developments where there was inadequate consideration of the lighting impact issue. The inclusion of such a criterion would help avoid such a scenario. It would also be consistent with the approach taken to noise sensitive development in section 2 d of the policy.</p> <p>It is therefore requested that a similar criterion is added to section 2 e along the lines of the approach taken to noise pollution in criterion 2 d (ii) of the policy</p> <p>Policy DM38: Open Land</p> <p>Policy DM38 is supported as it protects important open land within the urban areas that is used for outdoor sport such as community and school playing fields</p>
Included files	
Title	Environment and Biodiversity

ID	EGS1335
Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS1442
Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	In this plan, there has been little thought to wildlife and the air pollution in these areas.
Included files	
Title	Environment and Biodiversity
ID	EGS1449

Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> 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
Included files	
Title	Environment and Biodiversity
ID	EGS1450
Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife
Included files	
Title	Environment and Biodiversity

ID	EGS1485
Person ID	1142526
Full Name	Mrs Angela Goddard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Around our house we hve seen a barn owl, a pipistral bat and newts. We have photos to confirm this. Taking away the green belt will disturb and damage much of the indigenous wild life which has been here for ever. Once housing is built, the green belt can never be put back. We do not need the number of houses your calculations suggest.
Included files	
Title	Environment and Biodiversity
ID	EGS1505
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity

ID	EGS1544
Person ID	1253872
Full Name	Georgia Huelamo
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>National policy places great importance on the role in protecting the natural environment for now and for future generations. The housing numbers proposed and the areas where they will be constructed, will be impossible to achieve and will contravene this very policy in terms of improving air and water quality and look after wildlife sites and delivery a net gain in biodiversity by 2022.</p> <p>More brownfield sites must be considered in this proposal- for example under used car parks (Tesco Berkhamsted), garages (Northchurch) ,taller buildings in larger towns (Hemel) and 'applications in progress' before using greenfield sites.</p> <p>The biodiverse hedges and woodland along Darrs lane and Bell lane must be protected and both roads be turned into a walking /cycle route. This is without development. To ensure the protection of these hedgrows - 10 meters must be granted to enable species to continue to thrive. Assurances by the council must be made that any future development does not encroach on these hedgrows further that 10 meters. Everything possible must be done to protect these ancient hedgrows.</p> <p>The trees along the back of Granville road houses to the field, must also be protected and given adequate root space in order to continue to thrive. Tree protection orders must be put in place to ensure the security of these trees for the future. Nesting owls and bats, squirrels and birds have habitats there. Its always so amazing to hear the owls in the evening calling to one another. With mass development, the owls and bats will be disturbed. This is not acceptable.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS1559
Person ID	1260507
Full Name	Michael Burbidge

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>This section talks about preservation of the environment. Increased numbers of people and traffic will contribute to an increase in plastic litter that the council is already unable to deal with. (Drive along any road in Dacorum lane and see the rubbish). It also mentions noise pollution but again the council favours noisy road surfaces. Reducing the habitat of our wild animals and birds will not maintain let alone increase biodiversity.</p> <p>There is no evidence from the current state of affairs that development will improve the environment of biodiversity.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS1571
Person ID	1261809
Full Name	Pam Ferguson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I do not believe that the Dacorum local plan will deliver any net gain in biodiversity or even maintain the current biodiversity in Berkhamsted .The huge uplift in housing in the borough will put pressure on the Chilterns AONB.
Included files	
Title	Environment and Biodiversity
ID	EGS1646

Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS1690
Person ID	1165136
Full Name	Mr & Mrs J.D Battye
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Environment.</p> <p>The Vision is most likely to fall short on this count. The Int.SA p.17 clearly acknowledges "The combined effects of climate change, population growth and development needs will increase pressures on the natural environment."</p> <p>SA 7.1 p.65 states "The growth proposed will inevitably require new development on greenfield sites in the Green Belt with associated adverse effects and pressures on the natural and historic environment."</p> <p>The NPPF expects planning policies to adopt proactive strategies to mitigate and adapt to climate change (149),to conserve and enhance biodiversity and the natural environment and protect them from harm. All local authorities have</p>

a duty to do so under sec.40 of the Natural Environment and Rural Communities Act 2006 and yet a similar credibility gap exists historically where biodiversity and particularly tree planting are concerned. 2.52 merely promises to review the tree-planting programme.

At least this plan acknowledges for the first time at 18.59-69 the importance of trees in capturing carbon, improving air quality, mitigating flooding, preventing soil erosion, enhancing biodiversity and improving communal amenity. However, DBC's track record is not auspicious notwithstanding the ability of trees to fulfil almost half the objectives of sustainability appraisals. Its own policies have at times been traduced in removing trees (18.59), not replacing removed trees (contrary to NPPF provisions), allowing developers to clear sites (cf.18.60) and failing to enforce landscaping conditions (as per DM 37.2). A survey conducted in 2017 indicated that 48 trees had been removed on council land in Berkhamsted over the previous 5 years and only 22 new ones planted. Upon inspection, of those 22 only 7 were extant.

The intervention of local residents was the only action which prevented 3 large mature trees being needlessly removed from the Moor to make way for a temporary car park which has since caused further, as yet uncorrected, damage to one of the few public open spaces in the centre of Berkhamsted.

Given that DBC had declared a Climate Emergency in July 2019, it was appalling to see that the Portfolio holder for Environmental Services, no less, is recorded as stating that the planting of additional street trees was "not an option" because of problems to tarmac and underground cables" (minutes p.20 DBC Council meeting 26/2/2020) (cf.18.24) Disappointingly DM37 only expects "not " requires". With such attitudes and, in contravention of 23.124, the steady removal over time of trees in parts of the Conservation Area in Berkhamsted (High St ,Cowper Road, North Road, Montagu Road), can we even rely on the belated promise at 18.61 - to protect trees in conservation areas? Policies DM 4,36 & 37 will need to be rigorously enforced,

We also understand that DBC is statutorily required to carry out a screening process to assess the impact of proposed development on the Chiltern Beechwoods sites. This has not been completed and is urgently required in view of the extra damage which the areas have suffered recently as result of an explosion in usage in the wake of Covid-19.It is therefore unsound practice to be consulting at this juncture.

Included files	
Title	Environment and Biodiversity
ID	EGS1715
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	DM27, DM28, DM29, DM30 and DM31. I particularly support these policies. DM34 Flood risk is becoming a major issue and long term planning important. DM35 Good to see that Air, Water, Noise and Light are all included. DM36, DM37 and DM38. I support these policies.
Included files	
Title	Environment and Biodiversity
ID	EGS1754
Person ID	1262366
Full Name	Isabel Frankel
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The following are my principal objections: 1 Over development of protected green belt land, the Chiltern's AONB and the Chiltern's Beechwoods Special Area of Conservation. In addition I would remind the Council that it has a LEGAL duty to protect the AONB and its environs.
Included files	
Title	Environment and Biodiversity
ID	EGS1758
Person ID	1262366
Full Name	Isabel Frankel
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	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.
Included files	
Title	Environment and Biodiversity
ID	EGS1815
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS1839
Person ID	488516

Full Name	mr hugh siegle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>The growth proposed in this plan is not sustainable and cannot deliver the environmental and biodiversity policies; it will have the opposite effect. Development inevitably causes harm so it is important it is located where the least impact is made. The amount of growth needs to be reduced significantly and be more concentrated than scattered around the Borough, spreading the damage.</p> <p>A particular concern is Policy DM33 or rather the impact the proposed growth will have on the ability to meet the policy requirements. Our chalk streams are prized, globally rare habitats and must be protected from abstraction. Water company plans to source out of area water supplies do not match the timing or size of the proposed growth in development activity.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS1865
Person ID	1262481
Full Name	Madeleine Donohue
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Overdevelopment will put the Chilterns AONB under stress. Fragile chalk streams will be subject to denigration. Water run off and waste water could be very detrimental to the area.
Included files	

Title	Environment and Biodiversity
ID	EGS1883
Person ID	1262512
Full Name	William McCarthy
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>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.</p> <p>In addition, I believe that the scale of this development is excessive, due to being based on outdated ONS data (2014, as opposed to 2018).</p>
Included files	
Title	Environment and Biodiversity
ID	EGS1920
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS1944
Person ID	1262589
Full Name	Sarah Watson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Section 18</p> <p>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.</p> <p>In addition, I believe that the scale of this development is excessive, due to being based on outdated ONS data (2014, as opposed to 2018).</p>
Included files	
Title	Environment and Biodiversity
ID	EGS1996
Person ID	1262618
Full Name	Jasmine Jenkins
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I am happy to see that there is a very thorough and detailed plan for retaining biodiversity, expanding the number of trees and producing a net gain of biodiversity. It must be remembered however that all areas that are countryside have benefits for wildlife and they don't need to be a specific site of interest or beauty. We have to ensure that there are wildlife corridors and even where there is housing there can be some natural wild areas included.
Included files	
Title	Environment and Biodiversity
ID	EGS2021
Person ID	1262601
Full Name	Anne Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>DBC's local plan build numbers are clearly wrong and overstated. Population of Dacorum has only slightly increased since 1995 until recently but now following Brexit and in the middle of a pandemic, there are 1.3 million net export of people so the argument must be that developments should not proceed where biodiversity is compromised as not all developments will be needed. For example Lock Field is a recognised wildlife corridor which would be shut off by the proposed development. 80 species of birds have been identified in this area as highlighted in a Northchurch Parish Council Newsletter</p> <p>DBC identified highway safety issues around St Mary's school and at the junction of New Road and the High street as well as the need to alleviate existing air quality issues in this part of Northchurch way back in 2013. - little has changed since then and with the inclusion of the proposal of the BK07 site and the possible addition of 120 more cars, the effectiveness of DBC's environment policies has to be questioned.</p>

Included files	
Title	Environment and Biodiversity
ID	EGS2025
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>18.8 The aim of creating green spaces within towns is to be supported, but not at the expense of natural sites that support ecosystems built up over centuries.</p> <p>18.12 DBC's duty to protect the Chilterns AONB extends to places outside, but adjacent to the AONB such as Northchurch, which is almost surrounded by the AONB. Chilterns AONB Draft Management Plan objectives N01 to ensure spaces for wildlife are well connected and N06 to secure protected status for chalk streams as a globally rare habitat are particularly relevant here. Proposed development in Northchurch threaten to destroy wildlife corridors that link the strategic canal corridor to Northchurch Common and Rossway. The aquifers that feed the Bulbourne have suffered from human extraction over two centuries, (see Dacorum Environmental Forum <i>River Bulbourne 2009</i>) so that it now rises at Dudswell, well below its original source. Dense housing by the canal in Northchurch will result in the extraction of even more ground water.</p> <p>Visual intrusion is another factor that must be taken into consideration, in particular the urban sprawl proposed for the valley side opposite Northchurch Common and dense housing on Lock Field. The views of St.Mary's Church from the Ashridge direction are enhanced by open ground either side of New Road (the school playing fields and lower allotments) and the wooded, rural appearance of New Road (B4506) between the canal bridge and Northchurch Common. I particularly love the views of farmland and trees above Northchurch village nestling in the valley bottom. No reasonable person looking across the Bulbourne valley here would describe Northchurch as urban.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS2060
Person ID	1262738

Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS2107
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Environment and Biodiversity. Over development based on an outdated development matrix. Building on green belt and the removal of mature trees is a destruction of our environment. Building on the land adjacent to the A41 in berkhamsted will destroy wildlife that lives there and will subsequently have no where to go. It is a mass of habitat for bats, owls, foxes, badgers to name but a few. Ashridge is being trashed with too many visitors and the reason for this is the lack of green space in Berkhamsted which is going to decrease even further with the new development suggestions. There will be no green space at all on that side of the town just houses and a large road. All of which encroaches into the Chilterns AONB. Sticking a small patch of green grass in the middle of a housing development won't replace lost green belt and woodland.
Included files	

Title	Environment and Biodiversity
ID	EGS2146
Person ID	399537
Full Name	Mr David Featherstone
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>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 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> <p>The CCB Management Plan must be taken into account by Local Planning Authorities when developing local plans within or affecting the AONB and it may be a material consideration when considering planning applications. The 2019-24 Management Plan states:</p> <p>'A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority's legal duty towards the AONB applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). We have produced special advice in a Position Statement on Development</p>

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.'

Included files

Title Environment and Biodiversity

ID EGS2147

Person ID 399537

Full Name Mr David Featherstone

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

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.

Included files	
Title	Environment and Biodiversity
ID	EGS2161
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Your plans look like a "brown" future for a green area. I can see no way of releasing site 124 for development without having a major impact on our local wildlife. Your plans, rather than protecting our existing environment appear to be destroying or, at best, damaging it. I have no belief in your ability or even desire to protect wildlife habitats. Anyway, what does "a net gain" in biodiversity actually mean and how will you do this by 2022? I suspect you have no chance and these are just good looking words to get what you want. In terms of your 18.4 comment flooding etc, how exactly are you going to do this for Site No. 124 which spends a fair percentage of each winter effectively swamped?
Included files	
Title	Environment and Biodiversity
ID	EGS2201
Person ID	1262765
Full Name	Paul Rees

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	An inconvenient truth is that biodiversity is destroyed by the building of homes at scale and the relentless drive for growth. That is why the current proposals are wrong-headed and need to be changed - so that the envisaged number of homes is halved and human journeys are driven away from roads and onto cycle paths and lower levels of growth assumed. Villages, such as the historic Kings Langley, should also be far better protected to safeguard the future of settlements that have a village character and nature.
Included files	
Title	Environment and Biodiversity
ID	EGS2225
Person ID	1262860
Full Name	Susanne Rees
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Given Dacorum's stated aim to protect the environment and biodiversity, the number of envisaged new homes should be halved and the transportation priority should be to shift traffic away from roads and for people to be encouraged to instead make journeys on foot or by bike.
Included files	
Title	Environment and Biodiversity
ID	EGS2255

Person ID	1262907
Full Name	David Beaumont
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Lockdown has shown just how much people value the environment and need space, and a closeness to both flora and fauna, for their mental and physical wellbeing. Building on the green belt as proposed will do nothing to maintain this resource for future generations.</p> <p>I accept that the Green Belt is not sacrosanct but surely we should try to preserve as much of it as possible.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS2269
Person ID	1262925
Full Name	Nandipha Jordan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.</p> <p>Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses.</p>

The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.

The plan should also guarantee the following:

- Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices.
- Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted.
- All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator.
- Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.
- Control of polluted waters discharge to non-mains drainage prohibited.
- Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights.
- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.
- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.

Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files	
Title	Environment and Biodiversity
ID	EGS2295
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>BRAG supports the policies in this section that help mitigate harm caused by development and help preserve the environment/biodiversity of the area. That said, it doesn't matter how extensive or well written the policies are in this section, they should not and indeed cannot trump the protection Green Belt is legally afforded by the NPPF. In that respect this Plan and DBC have already failed by promoting 850 hectares of Green Belt for development on the premise that the Plan must aim for a 'target' that really is not a 'target'.</p> <p>All measures which protect the Environment and encourage Biodiversity are welcome, but this has to be seen against a background of significant increases in new homes and employment in the Borough.</p> <p>The potable water supplied to the Borough comes from aquifers. Policy DM33 makes no reference to the increased demand for water resulting from this growth. The Environment Agency has restricted the amount of water Affinity can abstract from aquifers and Affinity's long-term plan requires significant investment and cross-country cooperation and will produce little real growth in supply to the area until after 2030.</p> <p>With this background DBC propose "<i>working with partners to help restore river flows</i>" and under Policy DM33 "<i>avoid the need to abstract water from the ground, in particular the Rivers Ver, Gade and Bulborne catchments</i>".</p> <p>These chalk streams are acknowledged as a globally rare habitat. Figure 7 shows they flow through the heart of the Borough. For development to be sustainable improvements to the environment and biodiversity must be delivered alongside new homes and infrastructure.</p> <p>The only conclusion one can reach is that the growth proposed in this draft Plan is unsustainable development and should be rejected.</p>
Included files	

Title	Environment and Biodiversity
ID	EGS2337
Person ID	1262984
Full Name	Deborah O'Sullivan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The plan should be more ambitious with respect to Climate Change and Sustainability. Dacorum declared Climate Emergency in April 2019 and has committed to reducing carbon emissions across Council activities to net zero by 2030. This should include developments whose plans were guided and recommended by Dacorum Council
Included files	
Title	Environment and Biodiversity
ID	EGS2340
Person ID	1261830
Full Name	alistair budd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Again great words but sadly not born out when looking at the site plans
Included files	

Title	Environment and Biodiversity
ID	EGS2388
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	

Title	Environment and Biodiversity
ID	EGS2419
Person ID	1227518
Full Name	Mr John LOWRIE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Why destroy green belt land then tell us you are incorporating green spaces within the plan. It doesn't make sense. Leave the green belt alone
Included files	

Title	Environment and Biodiversity
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ID	EGS2445
Person ID	1262981
Full Name	Chris Mabley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Without enforceable conditions based on unarguable concrete up to date audits and assessment, planners remain powerless to comply with government policy on environment and biodiversity to provide a green future or support a healthy ecosystem. The plan is just words.
Included files	
Title	Environment and Biodiversity
ID	EGS2603
Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	

Title	Environment and Biodiversity
ID	EGS2775
Person ID	1262722
Full Name	Colin McCready
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	

Title	Environment and Biodiversity
ID	EGS2781
Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	18.1 The natural environment IS THE Borough's greatest resources DM28 - Protections seem quite weak. Can these not be strengthened. DM30 - Why not a 20% net gain? DM30 - para 2 - Proven to what level? Proven to you? There is always a balance (housing density vs impact).

18.36 - Completely agree. The estate is being trashed.
 DM33 - why is it acceptable that groundwater source protection zones can be damaged?
 DM33 - Water abstraction should not be allowed from R Bulbourne.
 DM35 - Housing near A41 will be significantly impacted by Air & Noise Quality.
 DM36 - Developers MUST protect and retain existing trees and hedgerows ...

Included files

Title Environment and Biodiversity

ID EGS2798

Person ID 1262731

Full Name Julie Battersby

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Environment and Biodiversity comment

DM27 The Chiltern Area of Outstanding Natural Beauty Management Plan, 2019-2024 (pg 76) states that "A development outside the AONB can cause harm to the AONB even if it is some distance away". Under S85 of the Countryside and Rights of Way Act 2000 (CRoW) the legal duty of the Council to the AONB applies when a proposal affects land within the AONB, regardless of where it originates and NPPF (172) states that 'great weight' should be given to conserving and enhancing the AONB. The scale of the proposed development in the Local Plan is so extensive it is predictable that current development proposals will impact negatively on the Areas of Outstanding Natural Beauty in many ways including the following:

- Increase footfall and visitor impact damaging sensitive sites and habitats;
- Building and tall infrastructures breaking the skyline;
- Damage to the tranquillity of AONB through increased road traffic and increased night light;
- Severe damage to the views across the valley of Berkhamsted and around Tring from multiple AONB locations.

- Due to the scale of the development, severe impact on the chalk stream catchment areas caused by excessive increased water uptake extracted from the chalk aquifer.

The proposed sites that are in the closest proximity (adjacent) to designated AONB area should be removed from the housing development proposals as a priority and, as exceptional circumstances have not been soundly demonstrated, the overall development scale reduced.

The AONB Management Plan states that the Chiltern chalk aquifer serves as a major source of drinking water for the AONB and wider sub region. There are three chalk rivers in Dacorum that flow through AONB including the R. Bulbourne and R. Gade and they are normally fed from springs seeping from the underground aquifer. These chalk rivers are of international significance and are categorised as a priority habitat under the Natural Environment & Rural Communities Act 2006 (S41). Many of the local river catchments have become over-extracted giving rise to a decline in river flow. On numerous occasions during dry summers I have personally observed that in places streams forming the catchment of the River Bulborne have run dry in the Northchurch area. Current levels of abstraction are unsustainable and need to be reduced to restore the natural chalk stream ecology and evenness of water flow particularly during dry summer months. New development requires the construction of new strategic water sources in the South East of England to prevent further reduction to the water levels in the aquifer and to avoid serious harm to these water courses and AONB ecology in the upper catchment that rely upon it. Without this assurance, the Council is in breach of S85 of CRoW 2000. See DM33 below for further comments regarding impact on chalk rivers.

DM28 In this policy the section 1 statement and DM29 appears incongruous with statements 2 and 3 and in my opinion, the emphasis of DM28 in point 2 and 3 is entirely inappropriate. Although I do not propose this phraseology, it could be more accurately summarised by intent as follows: 'All sites of merit will be protected, unless the Council feels they have justified in general that more houses are needed now or in the future, in which case developers only need to carry out a survey and demonstrate their intention to leave / remove items of interest or plant a few trees'. This policy should fundamentally be weighted in favour of the principle of protection, which is the intention of the NPPF, rather than in favour of enabling housing or other types of developments that could be modified or located elsewhere or in less important areas.

DM28 (2.) A change to statement 2 such as the following will improve the focus of this policy:

- 1 Development proposals which are likely to cause harm to sites of nature conservation or geological interest will only be permitted in exceptional circumstances where the need for the development significantly and demonstrably outweighs the harm and where:
 - 2 a) *Other sites that are of lesser importance are considered as an alternative and justified as being unsuitable* (e.g. a Value 4 site is considered instead of a Value 1 or 2 site).
 - 3 b) *It has been demonstrated that it is not possible to reposition the damaging aspects of the development to a different area of the site where the level of damage will be reduced.*
 - 4 c) *all other necessary measures to mitigate the impact have taken place*
 - 5 d) *preservation and compensatory provision in line with mitigation hierarchy (i.e. avoidance –minimisation – rehabilitation / restoration – compensation) can be secured to ensure that the overall coherence of the site is*

protected and with the intent to *conserve features and species specific to the original specialist habitat* and achieve a net gain in biodiversity.

DM28 3a I feel strongly that the Council is not giving sufficient support to endangered internationally significant habitats and habitats of wildlife species at risk of global extinction. This consideration is in the public interest. Such a pointed bias risks the reputation and standing of the Council. Habitats in this category should be fully protected from development regardless of any need for housing or 'lack of alternative'. 'Lack of alternative' is an entirely subjective concept which often is determined by cost, not options. There is always the alternative *to wait* whilst new technology is developed, modified proposals are produced, additional funding is secured, new sites become available, or solutions to a wider infrastructure problem are implemented. The only standard exceptional circumstances that should be recognised are *requirements necessary to support conservation, or prevent imminent risk to human life*. In the case of the later, only minimal damage to secure safety in the area should be permitted. Note NPPF 174d clearly states that development on SSSI's should not be permitted.

DM28 3b. The weighting of this section should also be amended in accordance with NPPF 175(c):

- 1 For sites of National importance and irreplaceable habitats such as Ancient Woodland:
 - 1 *Where the benefits of preserving the site clearly out-weigh the adverse impacts of development on the site, the development should not be permitted.*
 - 2 *Where the benefit favours development, there are no suitable alternatives or modifications to the proposal.*

DM28 3c What is the purpose of classifying local sites into wildlife value areas if the highest graded of these assets and their potential is so effectively disregarded by this policy? Surely it should be a consideration both here and in DM29 that sites that are listed as S41 NERC 2006 priority habitats, that is, have Value 1 Wildlife Site status (as classified by the Hertfordshire Ecological Network Dataset provided by Herts Environmental Records Centre), or are Value 2 (sites recommended by Hertfordshire Local Nature Partnership for protection and habitat restoration by the development management system), or sites that form strategic positions in the main wildlife corridors as mapped out on the local Biodiversity Action Plan, should be afforded higher regard for protection than sites that are entirely of Value 3 and below. Therefore, I recommend, in accordance with NPPF(174a), that the following amendments are made to statement DM28 3c:

- 1 For sites of County, sub-regional or local importance:
 - 1 *Locally designated sites of Value 1 and 2 (as classified by the Herts Ecological Dataset) and those that occupy strategic positions in the main wildlife corridors will qualify and be prioritised for protection from damaging development or for conservation, habitat restoration and enhancement, over sites valued at Value 3 and below.*
 - 2 *the local development needs significantly outweigh the biodiversity or geological conservation value of the site and there are no suitable alternatives or modifications to the proposal.*

DM29. Policies DM28 and DM29 could be merged. If my proposals for DM28 are accepted, then DM29 (1) is not required. If they are *not* accepted then DM29 b should be altered as follows:

1 Where loss of specialist habitats and highly adapted species can be mitigated and compensation provided

As it stands it affords little protection once a site is approved in principle for development as mitigation measures often inadequate to protect the specialist habitat and species that are highly adapted to live in only that habitat. Rehabilitation and Compensation measure are even less effective. In respect of rehabilitation, for many species, their available habitat can only support a certain number of individuals because of competition for food or sites to rest and raise their young. Moving them physically to a new site where others of that species are present generally only serves to increase competition between the incumbent individuals leaving many to become starved of the resources they need to thrive. Soon the population decreases to the previous sustainable level resulting in a net population decline. Mitigation by transference for such species is ultimately futile as it has no benefit beyond the short term. Where relocation is the proffered solution, *on-site developers should be required to prove evidence that re-location stands a reasonable chance of success for that species.*

Making these changes would demonstrate to constituents that the local authority has grasped the true intended outcome of the guidance to 'preserve and enhance biodiversity'. This should not just be about consideration of one wildlife community at one site, but the context of the species at *each* site in terms of the *biodiversity of the country*. The Council has the power under NPPF 174(d) to preserve such habitats and **is guided to refuse permission** to develop if significant harm to biodiversity resulting from development cannot be avoided. Without consideration of the broader context, the ecological survey will provide little support to vulnerable wildlife as it can be so easily over-ruled.

As graduate biologist with a PhD in the behavioural ecology of amphibians, I am very aware that many animals are extremely difficult to find and are easily missed, particularly if that Family or Genus of animal is not an area of expertise studied by the sampler, or the sampling of the site is confined to just one or two days across the year. All too easily, important species are missed. For example, in my own field research I have found terrestrial juvenile newts are extremely difficult to find, yet they are a much better indicator that a newt population is thriving than a find of an adult in a pond as they demonstrate successful breeding. A site may be one of the last refuges in the country for a species, or a stronghold for a particular species that is in rapid decline but not yet a protected. Ideally, section 2 would include "...will not result in a negative impact upon those species and habitats *and those of nationally declining species.*" Sampling should be carried out at several times of the year and *ecological reports should cover declining species as well as listed species* as destruction of their habitat will accelerate that decline. Through this broader consideration coherence of the site is protected with the intent to achieve at least current levels of *specialist habitat or vulnerable species* biodiversity and net gains in overall biodiversity.

DM30 Biodiversity net gain is possible to achieve through the introduction of a broad range of common species which colonise quickly, whereas the preservation of specialist habitat species which can take many years to establish provides far greater ecological and social value. Recent housing developments appears to suggest that both the Council and developers regard that the substitution of a short-lived tree monoculture (such as a handful of Silver Birch trees – which typically only live for about 40 years) with added shrubbery and turf are adequate ecological compensation for the removal of native rural hedges and ponds. This is clearly not the case in the long term, or even the short-term. Generally I believe these are included to make the site superficially more attractive to passing potential buyers, which is unnecessary where there is good house design and high demand. On-site developers *should be held to account* to prove that biodiversity

has been held or increased after five years, or provide a significant compensatory contribution to local biodiversity projects at that point if there is evidence that their assertions and measures to improve biodiversity were insufficient from the outset.

Unless there are present pockets of Ancient Woodland or specialist habitat, most of the biodiversity and ecological value in cultivated farmland fields lies in the hedges, ponds water filled ditches and tree lined verges that surround them and so far less mitigation to achieve net biodiversity is required on greenfield sites if these 'hot-spots' are preserved. Even a small pond provides an important contribution, in that it may be the only permanent source of water within the travelling distance or the territory of local wildlife. Therefore, I would like to see a third point added that (3) "*On-site development should encourage the retention of existing wildlife hot-spots in their design such as native rural hedges, established ponds, ditches and copses with adjacent buffer zones, unless it is proven that the feature has a poor long-term capacity for sustained biodiversity that would not be cost-effective to improve {eg a polluted pond}. Viable hot-spots are not required to be classified as species-rich or to be of a minimum size.*" This does not mean that small sections cannot be removed to enable access (that is currently permitted under the Hedgerows Regulations), or that they cannot be trimmed-down in the case of hedges, or tidied-up to remove invasive non-native species, but it does mean that by retaining them they:

- retain their value as a stepping stones in a small-scale wildlife corridor
- stand a chance of becoming a species-rich microhabitat of the future and
- Support the environmental objectives of the government (e.g. to reduce decline of hedgerows).

DM31– Agreed

DM32– Agreed

DM33 The intention to avoid the need to abstract water from the catchments of Dacorum's chalk rivers is meaningless without a solid proposal and action plan as to how this will be achieved. Mitigating water sources are neither in place, nor are likely to be soon and additional extraction that will inevitably result from new housing that further damages the aquifer, breaks this policy. The 2010 Water Cycle study for the plan period 2006-31 concluded that if 680 dwellings per year were built for 25 years (1700 homes – similar to the current proposals), additional imports of water would be required by 2024 during critical periods. The Local Plan does not address how it will ensure that the aquifer and three chalk rivers in Dacorum are protected from over-extraction or that a remedy will be available in good time, therefore the size of the entire development in the Local Plan should be scaled back significantly until provision of new sources has reached an advanced stage of implementation. That is the most effective way of 'avoiding the need'.

DM33 d) this should specifically include *canals*, where the watercourse and canal interconnect or are in close proximity.

A case study carried out in January 2021 (S Wilson – see evidence) provides recent evidence that the Rivers Bulbourne and Gade no longer behave as chalk streams should. He demonstrates that the rapid rise and fall in the water levels are more typical of urban run-off than chalk streams, which should have a more even flow. The NPPF 174 b explicitly guides the local authority to protect, conserve, restore and enhance priority habitats such as these streams and that can only be realistically achieved at present by reducing demand for extracted water to enable a more even flow.

The Council is required to promote the conservation, restoration and enhancement of priority habitats and that planning permission should be refused where significant harm to biodiversity cannot be avoided (NPPF 174c). The NPPF(170d) states that the Local Plan should establish coherent ecological networks more resilient to current and future pressures. This policy will clearly not be met in respect of the chalk stream ecological network which naturally forms a wildlife corridor from one side of Dacorum to the other and beyond. Many species living in it and along the banks, like the Otter, rely on a sustained flow of water which is normal in natural chalk rivers fed partly by underground springs like the Rivers Bulbourne and Gade. The Council has not demonstrated how significant harm to the specific and specialist biodiversity of this internationally important priority habitat will be avoided. The Otter has been recorded in Dacorum water courses (ref Herts Environmental Records Centre) and it is protected in the UK under the Wildlife and Countryside Act, listed as a Priority Species under the UK Post-2010 Biodiversity Framework 1981 and is listed as Near Threatened on the global IUCN Red List of Threatened Species. Biodiversity 'mitigation' by planting a few trees would be totally inadequate compensation for habitat damage that causes the loss of this delightful animal in Dacorum. The policy could be improved as follows:

- 1 secure opportunities to conserve and enhance biodiversity, to include reinstating natural buffer zones *and restoration of micro-habitats supporting vulnerable, recovering and reintroduced native species.*

What should be crystal clear water often becomes cloudy due to a heavy load of silt, chemical contaminants and general rubbish being washed in during periods of heavy rainfall. Therefore to support points e. and f. add:

- 1 *identify and reduce sources of pollution and excessive silt running directly into the waterbody from the banks*

DM34 Wilson also recorded flooding during his study. He observed that surface water running off hard-standing is rapidly directed via drains, ditches, etc. into these rivers during periods of medium and high rainfall causing the water levels to quickly rise and fall. Run off and rapid rise and fall will be exacerbated by the extent of the proposed development in the Local Plan creating additional hardstanding and impermeable surface areas such as roads and rooftops. Accumulation of silt and the progressive growth of vegetation in the silt in water channels both reduce the flow of water, which further increase the risk of flooding. The total quantity of new hardstanding will create a substantial quantity of additional surface water during heavy rainfall, which given the steep valley topography of much of the catchment of The Rivers Bulborne and Gade, will require significant measures to contain it such a balancing ponds (or even lakes) and robust storm drains. These should be strategically planned for and part of the scope of the development proposal considerations.

DM34 (2). It should be specified that any housing or densely occupied places of work planned in flood risk areas 2 and 3 should have raised ground floor levels incorporated in the design in addition to being in the safest parts of the site.

DM36 – Although hedges are briefly mentioned in some of the points, the title of this section gives insufficient weight to the protection of native woody verges and rural hedgerows; the latter defined as established by the Hedgerows Regulations 1997. This requirement would be given considerably more prominence in their designs by on-site developers if re-named **“Tree and Hedgerow Retention and Protection”**. I would like to see the commitment, that enforcement by the placing of Hedgerow Retention Orders, will take place for all hedgerows comprised predominantly of natural native species over 30 years old unless agreed in advance that their loss is minimal and unavoidable. As a guide the modifications set out in the Hedgerows Regulations 1997 should be acceptable and would preserve the protection for such hedges in common

areas that would otherwise be lost once housing development is approved. On-site developers should be guided to fill in any unsightly residual gaps with native hedge species. Privet, laurel and non-native planted hedges such as rhododendron should be excluded from this requirement.

Designs must be developed specifically to maintain ancient and species-rich hedgerows and their verges, including the routing of pathways to inside a development area to preserve roadside hedgerows in narrow lanes which would otherwise be lost to road-widening and pavement creation. Cosmetic improvements of a development should be regarded as an unacceptable justification for their removal by the roots, although it should be permissible to reduce them to a height that does not prejudice their recovery, growth or biodiversity. As recommended by Herts Wildlife Trust, to enable root growth for hedgerows and their biodiversity to thrive, *wherever possible an undeveloped 10m buffer zone should be planned for around existing rural hedgerows and any ditches or associated features within that zone retained*. Developers should be encouraged to understand that native hedgerow retention, like mature tree preservation, significantly and cost-effectively supports biodiversity. Those hedgerows found in many of Dacorum's lanes, including those in areas on the outskirts of settlements currently described as 'urban', are species-rich and priority habitats for preservation as they support species listed in S41 NERC 2006. Presence of such species should be taken into account as standard when consideration of a Hedge Retention Order, or when a 'woody verge' preservation requirement is considered.

DM37 1b– A minimum of 15m clearance is advised around Ancient Woodland and presumably stands of trees and at least 10m for hedgerows. Please consider adding the following :*'Best endeavours should be made to remove and prevent the spread of invasive species such as Japanese Knotweed'*.

DM38 It will be improved if the following amendments are included:

- 1 Addif it is for sports, recreation, *conservation*, or other community or social use....”
- 1 Add....criteria a. to c. and any historical, ecological or environmental assets within that should be preserved and visual amenity.

FARMLAND

I am disappointed that preservation of high quality farmland is not included for consideration in this or any section of the Consultation. Planning policy should take into account the economic benefits of a site including recognition of the contribution and wider benefits of the best and most versatile agricultural land, trees e.g. orchards and woodlands (NPPF 170). Agricultural land is classified into five grades. Grade one is best quality and grade five is poorest quality, where Grade 1 – 3a is regarded as the best and most versatile. The Provisional Agricultural Land Classification provided by Natural England Open Data classifies large areas of the proposed development land currently used for farming as Grade 2 and 3. I am very concerned about the loss of farmland in the proposal and the inability of our nation to be able to feed itself in the event of war, drought or prolonged natural catastrophe. Significant areas of our best farmland should be removed from the Local Plan.

Included files

[Evidence AONB.docx](#)

Title

Environment and Biodiversity

ID	EGS2879
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 * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS2931
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity

ID	EGS2949
Person ID	1263445
Full Name	Andrew Farrow
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	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 AONB”, the scale of the proposed housing development can only have a <u>significant and detrimental impact on the natural environment</u> . It is even possible that it might jeopardise recent proposals to upgrade the AONB to a National Park.
Included files	
Title	Environment and Biodiversity
ID	EGS2991
Person ID	1263478
Full Name	ELIZABETH RAILTON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Environment and Biodiversity: water supply is an issue in the area. There are threats to local chalk streams from water extraction to enhance supplies of drinking water. My property stands in the River Bulbourne and there have been periods in recent years when it has been almost dry due to water extraction. The river is an important local feature.

Included files	
Title	Environment and Biodiversity
ID	EGS3008
Person ID	1261190
Full Name	Neil Harwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>In the “Guiding Development Section Summary” of the Plan, the Environment and Biodiversity sub-section states that: “We have a clear framework for considering proposals which could affect our key landscapes, such as the Chilterns Area of Outstanding Natural Beauty”.</p> <p>The planning proposal clearly affects the setting of the AONB as it directly abuts it in a number of places. Policy DM27 states that planning permission should be refused unless the proposal conserves and enhances the Chilterns AONB’s special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation. The current proposal does not meet these criteria of conservation and enhancement.</p> <p>We aim to protect species and priority habitats and provide a 10% net gain of biodiversity. At least one Local Wildlife Site is to be lost and others damaged or otherwise indirectly affected. The most recent ecological baseline data dates from 2011, and so is now ten years out of date. Current industry standard practice is to re-evaluate baseline surveys on average every 2 years. As a result, there is no clear picture of where the priority habitats and species are, or an evaluation of their current condition.</p> <p>In terms of the delivery of a 10% gain in biodiversity, this cannot be achieved unless the proposal avoids such key priority areas in the first place. There is no real indication of how gain can be achieved with significant loss apparent from the plans and only cursory mention of enhancement in places. Policy DM30 on Biodiversity Net Gain states that “For development to be sustainable, improvements to the environment and biodiversity must be delivered alongside new homes and infrastructure (18.23)” and Policy DM28 Protection of Sites states that the Borough is committed to “seeking opportunities to create new spaces for nature conservation, such as informal green infrastructure managed for biodiversity benefit, or Local Nature Reserves (LNRs) (18.19)”. Quantified calculations of losses and gains are required to demonstrate that gain is achievable, which has not been done to date, and it is clear from the extent of the proposed development</p>

that substantial compensatory offsetting will be required to meet this target. This hasn't been identified, planned for or costed and should have been a material consideration of the viability of the Plan.

We will also ensure that existing trees are retained and protected, and that planting is a part of development.

The protection and retention of trees is not currently being achieved, with numerous smaller planning applications involving the removal and loss of mature trees, an example being the current Astrope Lane proposal at Long Marston that threatens 2-3 very large black poplar trees. Neither is there an assessment of the cumulative effects of numerous smaller applications to the Borough's tree resource. There is no evidence to suggest that a change to this trend would occur under the roll-out of the new Plan.

Plans show extremely limited amounts of landscaping and green space provision, and where these are indicated, they are generally on the very edges of development areas, which in turn will be threatened by future expansion. There has been little or no consideration of proper connectivity of green spaces across developed areas, which itself is a key component of achieving climate and biodiversity mitigation). With respect to the achievement of biodiversity net gain, there is no acknowledgement that well-maintained landscaping and green spaces contribute very little to biodiversity value and that additional areas designed for biodiversity and nature will be required as well.

We have provisions in place to reduce flood risk and we have highlighted potential flooding issues on a site-specific basis through the proposals and sites section of the document". As with the protection of trees, there is no evidence to suggest that effective flood risk management is currently in place across the Borough, with only evidence to the contrary clearly visible for all to see. At best, robust plans may ensure that existing flood risk is not worsened, but the Plan fails to evidence any more strategic measures that are being adopted to proactively address and reduce the current level of risk, which is severe in many places within the Borough.

Included files	
Title	Environment and Biodiversity
ID	EGS3229
Person ID	1263566
Full Name	Frances Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS3274
Person ID	1262255
Full Name	AJ W
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Such measures should not be required if we were to leave the Berkhamsted greenbelt land intact and the water table as it should be. As such this is not a sustainable development and should not be allowed.
Included files	
Title	Environment and Biodiversity
ID	EGS3371
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS3381
Person ID	1261609
Full Name	DEBORAH CROOKS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS3423
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Environment and Biodiversity comment	No comment
Included files	
Title	Environment and Biodiversity
ID	EGS3437
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>All measures which protect the Environment and encourage Biodiversity are welcome, but this has to be seen against a background of significant increases in new homes and employment in the Borough.</p> <p>The potable water supplied to the Borough comes from aquifers. Policy DM33 makes no reference to the increased demand for water resulting from this growth. The Environment Agency has restricted the amount of water Affinity can abstract from aquifers and Affinity's long-term plan requires significant investment and cross-country cooperation and will produce little real growth in supply to the area until after 2030.</p> <p>With this background DBC propose "working with partners to help restore river flows" and under Policy DM33 "avoid the need to abstract water from the ground, in particular the Rivers Ver, Gade and Bulborne catchments".</p> <p>These chalk streams are acknowledged as a globally rare habitat. Figure 7 shows they flow through the heart of the Borough. For development to be sustainable improvements to the environment and biodiversity must be delivered alongside new homes and infrastructure.</p> <p>The only conclusion one can reach is that the growth proposed in this draft Plan is unsustainable development and should be rejected.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS3510

Person ID	1263810
Full Name	David Tolfree
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS3563
Person ID	1263797
Full Name	Chloe Collins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Dacorum declared a Climate Emergency in July 2019 and have committed to reducing carbon emissions across Council activities to net zero by 2030. The declaration also places key responsibilities on the Local Plan to include all available measures to cut carbon emissions and reduce the impact on the environment.</p> <p>The Plan goes on to say that the impacts of growth will be reduced through: the prudent use of natural resources; encouraging renewable energy production; the effective recycling of waste; the sustainable design of new development and careful land management.</p>

Tring Rural PC would strongly advocate and support a Service Level Agreement between Dacorum Borough Council and Buckinghamshire Council agreeing a cross-boundary partnership to allow residents of the parish to utilize the facilities of the Household Recycling Centre at Aston Clinton, a distance from the Parish boundary of approximately 1 mile.

This would concur with and support the following;

- Hertfordshire Waste Management Development Framework 2011 – 2026
- Dacorum Sustainable Waste Development
- Dacorum Recycling Carbon Footprint
- Dacorum Cross Boundary Working

Currently residents of the parish use the nearest Borough Household Waste and Recycling Centre in Berkhamsted, a round journey in excess of 20 miles.

To achieve this, we would draw attention to **Buckinghamshire Council Household Recycling Centre's Waste (HRC's) Access and Acceptance Policy (WAAP)** 1st August 2020 detailing permitted users of their sites and clarifies access for Non-Buckinghamshire households.

- The WAAP identifies by map, a 7-mile radius catchment area (which includes Tring Rural Parish)
- Policy A5 recognises that in most cases residents will use HRCs that are closest to their household, hence there will be some cross-border use of HRCs.
- Policy A5.2 affirms that the Council may set up Service Level Agreements (SLA) with neighbouring authorities for cross-border access to ensure the costs of provision of the HRC are shared fairly.

Included files

Title Environment and Biodiversity

ID EGS3570

Person ID 1263821

Full Name	Anne Isherwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Exisitng 'green' spaces, woodland, farmland must be protected from too much devlopment too close to them.
Included files	
Title	Environment and Biodiversity
ID	EGS3589
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS3609
Person ID	1263865

Full Name	Robin McMorran
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	This is utter greenwash. Prefacing a plan to concrete over acres of green belt land and cover it with bogging Wimpey houses with weasel words like "protecting and enhancing the natural environment" and "helping to improve biodiversity" is beyond cynical. This is Orwellian Newspeak at its finest.
Included files	
Title	Environment and Biodiversity
ID	EGS3618
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair Dacorum Environmental Forum Waste Group
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<i>"All major development will be required to deliver an overall net gain in biodiversity of 10%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator".</i> Achievement of this laudable aspiration would require as a baseline a comprehensive biodiversity register in order to quantify the value of all our existing natural habitats before one could begin to assess how they would be affected by development.

The Natural England Biodiversity Metric 2.0 Calculator is not scheduled to be published until spring 2021. Furthermore, replacing fields with houses, gardens and parks cannot provide a home for displaced farmland birds such as Linnets, Yellowhammer, and Skylarks, (which are on the RSPB Red list), and farmland creatures such as Brown Hare. All these are regularly seen in the Borough by keen naturalists. Where will the additional farmland be created for displaced farmland fauna?

For our full response see:

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

The link below if you are viewing this online

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

Included files

Title Environment and Biodiversity

ID EGS3627

Person ID 222269

Full Name Georgina Tregoning

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment I do not believe that there is sufficient housing need in the Borough to support the destruction of so much Green Belt land.

Included files

Title Environment and Biodiversity

ID EGS3657

Person ID 1263890

Full Name Chris Munday

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	A lack of linkage to the planning for a National Park for the Chilterns is a missed opportunity. The rampant disregard of the area around Tring is deeply disturbing. There is no reason for this wanton destruction of areas of AONB and SSSI
Included files	
Title	Environment and Biodiversity
ID	EGS3717
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	Destroying the beautiful green lands of Berkhamsted is not the right way to do it
Included files	
Title	Environment and Biodiversity
ID	EGS3730
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS3786
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	How is this plan conserving and enhancing the environment? It does the opposite - it destroys and diminishes the environment and increases the burden on environment linked utilities like water. Please stop and reconsider.
Included files	
Title	Environment and Biodiversity
ID	EGS3855
Person ID	1263924
Full Name	Susan Moore
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	David Attenborough has made the case for Biodiversity very clear. What better representation is needed. Our living world needs to be put ahead of greedy planners and builders. We only have this one chance to do something. So redevelop town centres for housing and business. Leave the countryside alone.
Included files	
Title	Environment and Biodiversity
ID	EGS3874
Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	You are not helping the environment
Included files	
Title	Environment and Biodiversity
ID	EGS3942
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	' National Planning Framework (NPPF) expects planning policies to conserve and enhance the natural environments and to protect them from harm.' How is this possible with this number of houses being built on green belt - a vital amount of green space? This makes no sense at all in the context of protection of the environment and biodiversity.
Included files	
Title	Environment and Biodiversity
ID	EGS3951
Person ID	1264032
Full Name	Angela Vanderpluym
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The proposal will result in the loss of far too much green belt. You cannot preserve landscapes and habitats on which you build. The negative impact on biodiversity in the Chilterns - an AONB will be devastating.
Included files	
Title	Environment and Biodiversity
ID	EGS3979
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I am concerned that the plans clearly build in green belt area next to the AONB. They also highlight areas of development which will destroy existing fields and hedgerows which provide a wildlife haven and corridors for animal travel. Ancient pathways such as Sugar Lane at the top of the field in Swing Gate Lane, earmarked for development, will be destroyed but it was an ancient ridge path and information can be found at Berkhamsted History Society. Can you reassure that developers will not disturb existing hedgerows and woodland both forever and by disturbing the wildlife to the extent it will not return.
Included files	
Title	Environment and Biodiversity
ID	EGS4086
Person ID	1259583
Full Name	Marc Best
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>‘The natural environment is one of the Borough's greatest resources and encompasses the landscape of the countryside and green infrastructure’</p> <p>‘The landscapes of the Borough are highly valued by the people who live and work within them or use them for recreation’</p> <p>The plan contains the two quotas above yet if it goes ahead it will both damage the environment and biodiversity</p> <p>18.53</p> <p>References areas with needed improvements in air quality, yet the plan proposes to add new dwellings which will result in more cars</p>

Included files	
Title	Environment and Biodiversity
ID	EGS4103
Person ID	1263468
Full Name	Bruce Day
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The rain and lockdown conditions affecting the rural scene during 2020-2021 demonstrate clearly how the environment and biodiversity can be affected by increased footfall. Paths have widened into agricultural and environmentally sensitive areas by walkers and there has been a significant increase in wheeled traffic. The proposed scale of housing in and around Berkhamsted and Tring will significantly multiply this effect to the severe detriment of the natural environment, in Ashridge for example, which Dacorum policies identify as "one of the Borough's greatest resources".
Included files	
Title	Environment and Biodiversity
ID	EGS4111
Person ID	1264210
Full Name	Fiona Fulford
Organisation Details	myself
Agent ID	1264200
Agent Name	Fiona Fulford
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Environment and Biodiversity comment	<p>This whole section of the plan supports the valuable nature of the Chiltern Beeches SAC and AONB. This flies completely in the face of the rest of this development plan which is based on the destruction of 850 hectares of green belt land on the doorstep of these areas, in turn having a detrimental impact upon them. I understand such development of green belt near to such areas is also not legally allowed as 'special circumstances' for development.</p> <p>Housing projections need to be halved based on the 2018 ONS numbers and a review of brown field sites needs to be done post pandemic, to significantly reduce this land grab.</p> <p>In addition the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS4120
Person ID	742793
Full Name	Mr Lawrence Sutton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Environment and Biodiversity comment	<ol style="list-style-type: none"> 1 Permission for major developments in the Chilterns Area of Outstanding Natural Beauty (AONB) will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it: <ol style="list-style-type: none"> 1 conserves and enhances the Chilterns AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation; <p>The only 'exceptional circumstance' being provided for building on an AONB and protected Green belt is a government target for house building that is not suitable for the Decorum area and should be rejected.</p>

As the council has stated its role is to enhance and conserve the AONB and not allow the building of house on Green Belt land that they should be protecting for future generations.

If the Green Belt land is released and built on the 'distinctive character, tranquillity and remoteness' will all be destroyed forever. No adequate need for doing this is justified in the Docrum proposal.

Included files

Title Environment and Biodiversity

ID EGS4145

Person ID 1262892

Full Name Jean Farrer

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Environment and Biodiversity comment I agree with 18.1. I do value the countryside in Dacorum and see this as the main reason to live here. It is Dacorum's greatest asset. You can only destroy it once. Please listen to your residents and the submissions of the CPRE and the Chiltern Society in particular for detailed comments about the need to present robust arguments to protect the Green Belt.

Included files

Title Environment and Biodiversity

ID EGS4177

Person ID 1145844

Full Name Dr and Mrs Melvyn Else

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	DM 38 as a policy defines what happens after a piece of land is designated as open land. It does not define how or why an open land designation is assigned to an area. The Relevant and Supporting Guidance shown below states Policies Map. The policies map is neither evidence nor justification. Where is the evidence or justification to support sites shown on the map as Open Land/Space and in particular those added in 2017. The Councils definition of Open Land is ever expanding but where is the supporting evidence or justification for this expanded definition? The map shows them as open space but some are open land with no public access at all. Footnote 33includes amenity greens, amenity land adjacent to dwellings, landscped margins, buffers or strips and stripes, small woodland copses and othe incidetal open land that contributes to the open character for visual amenity of neighbourhoods and settlements which can be justified but these areas will not meet the previous criteria of an area of at least 1 Ha for an Open Land designation. Equally the inclusion of private garden land in point 3 would appear a new addition to the Open Land criteria. Where is the supporting justification. Private garden land is private and has no public access and should not be lumped together with open spaces such as parks and recreational facilities such as sports fields, The latter all offer public ammenity a private garden does not. Ironically a large private garden behind hedges and fences offers no public ammenity until it is opened up for devlopment at which point public access becomes much easier.
Included files	
Title	Environment and Biodiversity
ID	EGS4226
Person ID	1264269
Full Name	Paul de Hoest
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity 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.

I repeat my observation above that the concept of offsetting environmental and biodiversity daamage created by over-development is utterly delusional. The intended offsetting benefits will take decades to come through.

Included files

Title Environment and Biodiversity

ID EGS4230

Person ID 1264306

Full Name Peter Williams

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment Re policy DM30 we note that the biodiversity offsetting policy only applies to major development. However, as set out at paragraph 175 of the NPPF such provision applies to all development, not just major development. We would therefore urge that the approach set out in the draft plan is reconsidered and brought into line with Government guidance/policy.

Included files

Title Environment and Biodiversity

ID EGS4315

Person ID 1264321

Full Name David` Fox

Organisation Details personal

Agent ID 1264318

Agent Name David
Fox

Agent Organisation

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>This whole section of the plan supports the valuable nature of the Chiltern Beeches SAC and AONB. This flies completely in the face of the rest of this development plan which is based on the destruction of 850 hectares of green belt land on the doorstep of these areas, in turn having a detrimental impact upon them. I understand destroying green belt so near to such areas is also not legally justified under 'special circumstances' for green belt development.</p> <p>Housing projections need to be halved based on the 2018 ONS numbers and a review of brown field sites needs to be done post pandemic, to significantly reduce this land grab.</p> <p>In addition, the Thakeham / Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS4329
Person ID	1264325
Full Name	Olivia Halper
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>18.23 update to reflect biodiversity net gain being made mandatory.</p> <p>DM30: HGC expect over 10% net gain, can this be reflected i.e. 10% net gain is a minimum not a target.</p> <p>DM31: Not sure how this proposed policy can be consulted on without an HRA and Appropriate Assessment having been prepared to help us understand if the policy requirements are capable of avoiding or mitigating impacts. We don't know what the suite of mitigation measures have been considered and rejected and why.</p> <p>In the SAC topic paper, section 4 summarises evidence around air quality impacts arising from vehicles and traffic modelling, including how growth from development in neighbouring areas may impact on the SAC. We support the precautionary approach suggested that the 'in combination' assessment (and further traffic modelling) which will undertaken</p>

as part of your HRA should also include information or assumptions about expected traffic growth levels in St Albans District. Furthermore, if land at East Hemel or any other land in St Albans District is located within the Zone of Influence yet to be determined for recreational pressure on the SAC, this should be identified and raised with SADC at the earliest.

Included files

Title Environment and Biodiversity

ID EGS4359

Person ID 1264342

Full Name Ms Hilary Lawson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment Increase in air and noise pollution: When the A41 bypass was built, the buffer between the road and housing in Berkhamsted was intended to be a 'green lung', absorbing traffic noise and pollution. A large proportion of the proposed housing development is planned on this land.

Included files

Title Environment and Biodiversity

ID EGS4409

Person ID 1259206

Full Name Greg Smith

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Environment and Biodiversity comment	18.39 The chalk streams on both side of Berkhamsted are already polluted and the council admits they are in a poor condition due to pollution. The canal & chalk stream in the middle of Berkhamsted stinks of raw sewage at times when it overflows which further pollutes our local waterways and the rivers downstream. The sewage network in Berkhamsted is not coping with the current population so how much worse will the sewage overflow be with thousands more residents in the valley? All wastewater infrastructure will need a significant upgrade before any future developments should be approved.
Included files	
Title	Environment and Biodiversity
ID	EGS4413
Person ID	1264062
Full Name	James Metcalfe
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I am unhappy with the amount of green belt land being built on.
Included files	
Title	Environment and Biodiversity
ID	EGS4461
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS4471
Person ID	1207786
Full Name	Anne Foster
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>We live in an amazing area and policies to help preserve countryside, waterways and special sites are to be applauded, but I find a contradiction between the policies and the reality of what is proposed in the plan.</p> <p>Massive amounts of developments within the Greenbelt, destruction of habitat and ecology are to be offset by wildlife corridors and small areas of open space - it's take a mile and give back an inch.</p> <p>There are only 240 chalk streams in the whole world and Dacorum has quite a few. Policy DM 33 which aims to protect them is welcomed, but their existence is contingent on the chalk aquifers, which are heavily abstracted for our water supply. There is no reference to the potential impact on them from the increased demand for water from the proposed development, though the EA has currently restricted further abstraction. For light relief I include a picture of the Bourne Gutter a chalk stream which only appears when the aquifers are full, and supposedly at times of impending disaster. - currently flowing well.</p>

Included files	B6E7CFA9-5E3C-4133-964B-11AE145FEE63.jpeg
Title	Environment and Biodiversity
ID	EGS4496
Person ID	1264403
Full Name	Jake Latham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Water and waste impact.</p> <p>There is no mention in the strategy on how the plans will 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.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS4503
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS4530
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>My family and I moved to Dacorum in 2018 to settle in Berkhamsted for at least the next 25 years. Over this time, we look forward to developing ever stronger links throughout the community and watching our young children grow to adulthood. As such, we have a vested interest in seeing the Borough grow in a way that works for all its citizens – both existing and new.</p> <p>Against this backdrop, I wish to formally state my strong objections to the ‘Dacorum Local Plan (2020-2038) Emerging Strategy for Growth’. The evidence suggests that, if this plan is approved, your personal legacy will be of considerably worsening towns and communities within the Borough. For new residents moving to the area and for those already here. For all ages. And for all financial situations. I suspect you don’t want to be remembered after you leave this office as the person who caused such damage to an area. So, I ask you to fundamentally rethink.</p> <p>Due to the COVID-19 constraints on travel and mingling for the past year, my experience, and hence prime objection, focuses on the portions of the Local Plan relating to developments in the Berkhamsted area.</p> <p>To summarise:</p> <ol style="list-style-type: none"> 1. Flawed modelling of number and type of housing required would fail to meet the actual needs of the voters moving into the area, whilst disrupting those already here far more than is needed. 2. Inadequate commitment to transport infrastructure needs to accommodate the changes proposed would result in a legacy of decades of traffic congestion for voters in Dacorum and visitors to the area. 3. Insufficient provision of water supply, wastewater disposal and other infrastructure would leave households with shortages and damage the local water table, with knock-on considerations around subsidence and environmental impact.

4. Unworkable assumptions around public transport and foot / bike journeys would see considerable increase to carbon emissions in the Borough and considerable travel delays around vital transport hotspots (town centres, schools, rail stations, etc.).

5. The above worsening of conditions for the new and existing voters in the area also comes with an ecological cost due to the loss of green belt. If green belt is to be repurposed, it must be done in a way that makes the greatest positive impact for the current and future residents of Berkhamsted. This plan wastes that sacrifice.

These are fundamental flaws in the strategy underpinning the 'Dacorum Local Plan (2020-2038) Emerging Strategy for Growth'. As such, this plan should be rejected outright, and a new plan drawn up that addresses the actual needs of the area for today and the long-term success of the Borough.

These points are expanded below.

Incorrect Assumptions for Housing Provision

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

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

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

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

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

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

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

Failure to Provide Adequate Supportive Infrastructure

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

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

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

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

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

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

Impact on Green Belt and Other Designated Land

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

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

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

You are now faced with a personal choice.

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

Included files	
Title	Environment and Biodiversity

ID	EGS4558
Person ID	1264064
Full Name	Melanie Ingram
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>DM30.1 - There is no mention of the councils responsibility to monitor the ongoing management of this commitment made by developers to ensure that this is delivered for the benefit of the communities they serve.</p> <p>DM32. The Ashridge estate has already struggled with visitor volumes prior to the coronavirus pandemic and during it (as people sought open space to exercise), the damage caused by vehicles and people is already degrading footpaths and bridleways and is impacting air quality around key sites. It will only be a matter of time before there is a serious accident with the increased traffic volume which will only get worse because of the increased populations in nearby settlements.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS4582
Person ID	1145918
Full Name	Mr Richard Tregoning
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS4688
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Berkhamsted high street and the adjacent streets being in a valley, are effectively in a 'bowl' and I am concerned about air quality there at present. The plans to allow 2,200 more dwellings would inevitably have a detrimental impact on air quality. i understand that Apsley has this problem that has been recognised by DBC.
Included files	
Title	Environment and Biodiversity
ID	EGS4700
Person ID	1264462
Full Name	Penny Clifton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	The natural environment of Dacorum is indeed one of the borough's greatest assets, but I dont feel that this plan does enough to recognise the need to maintain, protect and restore wildlife habitats, create 'wildlife corridors' and ensure the natural woodland and chalkland areas are protected. Increasing the urban sprawl of Berhamsted and Tring into pristine countryside runs counter to the green vision expressed in the draft plan.
Included files	
Title	Environment and Biodiversity
ID	EGS4710
Person ID	1264500
Full Name	GARY AND HEATHER FRIEND
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I am in full agreement with comments on Emerging Strategy for Growth from Chiltern Society, Chiltern Countryside Group 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
Included files	
Title	Environment and Biodiversity
ID	EGS4766
Person ID	1264515
Full Name	SUZANNE JAMES
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Pollution. Poor Air quality has been noted in Northchurch and Berkhamsted. Most residents live along the valley and towards the bottom and up the sides and air pollution naturally collect in this area. Development proposed on this scale will only result in further air pollution, affecting those with asthma and respiratory condition the worse.
Included files	
Title	Environment and Biodiversity
ID	EGS4807
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The whole plan contradicts the empty words in 18.1, 18.2, 18.3, ff. If you believed in what these paragraph state, this plan would not be in front of us.
Included files	
Title	Environment and Biodiversity
ID	EGS4879
Person ID	1264524
Full Name	Karen Kang
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	This policy talks about the natural environment being one of the Borough's greatest resources but this completely contrary to the plan to build on Green Belt land.
Included files	
Title	Environment and Biodiversity
ID	EGS4976
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent ID	1264539
Agent Name	Bethan Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>This whole section of the plan supports the valuable nature of the Chiltern Beeches SAC and AONB. This flies completely in the face of the rest of this development plan which is based on the destruction of 850 hectares of green belt land on the doorstep of these areas, in turn having a detrimental impact upon them. I understand destroying green belt so near to such areas is also not legally justified under 'special circumstances' for green belt development.</p> <p>Housing projections need to be halved based on the 2018 ONS numbers and a review of brown field sites needs to be done post pandemic, to significantly reduce this land grab.</p> <p>In addition, the Thakeham / Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5040

Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>I support the policies in this section and am concerned that they are not being met in the proposed plan. As an ancient market town, the natural environment, countryside and green infrastructure is one of Berkhamsted's greatest resources. Promoting 850 hectares of Green Belt for development and dismissing the protection of the Green Belt legally afforded by the NPPF without presenting any sound justification that it meets the 'exceptional circumstances' required shows a complete disregard of national policies. DBC are citing a questionable target for building as their reason for the destruction of Green Belt with the resultant harmful effect on the health and wellbeing of residents when their 'Green Lung' is permanently obliterated. DBC have the opportunity to present arguments why preserving the precious Green Belt would limit the possible house numbers, but have chosen not to do so without any explanation.</p> <p>CPRE and BRAG have both submitted responses highlighting the effect that the proposed level of new homes will have on the Borough and draw attention to the water supply issues. I support the points that these two organisations have raised, especially in relation to the rare habitats which will be impacted.</p> <p>I agree with the conclusion that the growth proposed in this draft Plan is unsustainable development and should be rejected.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5061
Person ID	1264258
Full Name	Fintan FitzPatrick
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.</p> <p>Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses.</p> <p>The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.</p> <p>The plan should also guarantee the following:</p> <p>Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices.</p> <p>Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted.</p> <p>All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator. Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.</p> <p>Control of polluted waters discharge to non-mains drainage prohibited.</p> <p>Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights.</p> <p>Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.</p> <p>Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).</p> <p>If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.</p> <p>Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).</p>
Included files	

Title	Environment and Biodiversity
ID	EGS5095
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 * No	Yes
Environment and Biodiversity comment	Strongly support DM27 and DM31. Support all the remainder in principle while profoundly concerned that they will be ineffectual in the face of development on the scale envisaged.
Included files	
Title	Environment and Biodiversity
ID	EGS5119
Person ID	1250013
Full Name	Mrs Nikki Bugden
Organisation Details	Clerk Nash Mills Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	ENVIRONMENT AND BIODIVERSITY <i>Potential harm to Chilterns AONB</i>

While the proposed provision of housing will probably have minimal impact on Nash Mills and the green belt areas within the parish, we do support concerns voiced by other parish councils and CPRE that the scale of proposed development will cause harm to green belt across Dacorum and the Chilterns AONB, including longstanding eco-systems and early plans to extend the AONB or upgrade its status to National Park.

Further harm to chalk streams

It is recognised in the plan that there a climate change emergency and that there is a potential for increased drought. Paragraph 18.39 states that *“The three chalk streams of the Rivers Bulbourne, Gade and Ver within Dacorum are considered of poor or moderate status against the Water Framework Directive”*. We support the concerns raised by CPRE that the proposed developments would have a severe impact on water supply and waste water disposal. According to CPRE, current supplies would be put under severe strain meaning additional water extraction from the chalk aquifer and further damage to the chalk streams. They also state that new supplies of water are not likely to be possible until after 2030.

Protecting green spaces

We are pleased to see that every residential growth development includes provision for public open space (through Policy DM63) and a country park within the largest site in Hemel Hempstead and that these spaces are protected from future development (para 22.45). How can we be sure that smaller green space will not be used for additional parking as sometimes occurs in existing developments?

Included files	
Title	Environment and Biodiversity
ID	EGS5127
Person ID	1264550
Full Name	Kevin Fielding
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Some of the sites now being considered for development have previously not been considered as they are protected Green Belt land. This is the case for the South Berkhamsted proposed development. As a result, no long term and detailed studies have been undertaken on the biodiversity and special characteristics of these areas. For South

Berkhamsted, a walk today revealed the presence of many species, some of which are struggling nationally due to loss of habitats: one animal example are ground nesting birds (skylarks), one plant example are wild spotted orchids (I will confirm species later in year when flower). There are also mature oak habitats within the forested land by the A41 which have developed over hundreds of years.

Included files

Title Environment and Biodiversity

ID EGS5131

Person ID 1258646

Full Name Jane Timmis

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

Environment and Biodiversity

Indeed the natural environment is one of the Borough's greatest resources, but by building houses over so much Green Belt and green space it is destroying a large part of it.

The protection of the Green Belt and natural environment should be of primary importance and only breached for exceptional circumstances (NNPF); so why is the Borough set on destroying the Green Belt, on the basis of a housing need that there is no evidence for?

The vision of growth largely over countryside and with disproportionate numbers on the outsides of our two market towns will hardly **enhance the beauty of the Chiltern Hills!** Houses and people and cars in excessive numbers **do not enhance** the beauty of the countryside. The claim that by providing green spaces and planting some woodlands the Borough will be even greener, while building over 2,000 acres of Green Belt, is counter intuitive.

Hopefully some of it can be recouped.

Included files

Title Environment and Biodiversity

ID EGS5168

Person ID	1264509
Full Name	Hannah Fox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>This whole section of the plan supports the valuable nature of the Chiltern Beeches SAC and AONB. This flies completely in the face of the rest of this development plan which is based on the destruction of 850 hectares of green belt land on the doorstep of these areas, in turn having a detrimental impact upon them. I understand destroying green belt so near to such areas is also not legally justified under 'special circumstances' for green belt development.</p> <p>Housing projections need to be halved based on the 2018 ONS numbers and a review of brown field sites needs to be done post pandemic, to significantly reduce this land grab.</p> <p>In addition, the Thakeham / Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5184
Person ID	1264593
Full Name	Rebecca Mackenzie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	<p>How can building on green belt be good for the environment?</p> <p>How are these exceptional circumstances? Surely you can be more creative about building on brown sites, redeveloping sites, not destroying more of our natural environment. As you say, the natural environment is one of Dacorum's strengths, so don't destroy one of it's strengths please.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5223
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>This whole section of the plan supports the valuable nature of the Chiltern Beeches SAC and AONB. This flies completely in the face of the rest of this development plan which is based on the destruction of 850 hectares of green belt land on the doorstep of these areas, in turn having a detrimental impact upon them. I understand destroying green belt so near to such areas is also not legally justified under 'special circumstances' for green belt development.</p> <p>Housing projections need to be halved based on the 2018 ONS numbers and a review of brown field sites needs to be done post pandemic, to significantly reduce this land grab.</p> <p>In addition, the Thakeham / Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5264
Person ID	1175740
Full Name	Berkhamsted Schools Group

Organisation Details	The Berkhamsted Schools Group
Agent ID	1175743
Agent Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Environment & Biodiversity</p> <p>Again, this topic is at the heart of the BSG's philosophy. In our previous submission to the DBC Issues and Options consultation, our proposal at that time, due to lower housing numbers being recommended then by DBC (765dpa) was that the front playing pitches part of site BK 03 would be a housing allocation and in addition some of the land to the rear would be offered for appropriate bio-diversity gain. A preliminary ecology report was produced and submitted which concluded that the rear land offered potential for a variety of forms of ecological enhancement such as walking corridors, wildlife/nature enhancement and/or open space.</p> <p>The proposed allocation at Haslam Field, site BK03 put forward by DBC in this draft plan, is for a larger housing allocation including the land to the rear, which we strongly support. The detailed layout and design of the final allocation will still offer significant scope for appropriate levels of bio-diversity enhancement on part of the land at the rear or potentially some open space provision at the front, if that is deemed a more appropriate location. We wish to work on the detail of this with DBC officers and expert consultants once the plan has progressed past this consultation phase.</p> <p>The level of bio-diversity gain and open space provision should be the amount necessary to cater only for site BK03 and not subsidise other sites to provide lower levels of provision than required.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5290
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS5295
Person ID	1263726
Full Name	Andrew Gifford
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	"The natural environment is one of the Borough's greatest resources" so we propose to encroach of Green belt, increase traffic density and build of natural flood areas
Included files	
Title	Environment and Biodiversity
ID	EGS5335
Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS5369
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	" The natural environment is one of the Borough's greatest resources and encompasses the landscape of the countryside and green infrastructure" Agreed! please protect it !
Included files	
Title	Environment and Biodiversity
ID	EGS5441
Person ID	1264636
Full Name	Lynsey Bilisland
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Environment and Biodiversity comment	The destruction of Greenbelt and the impact this has on the environment can never be justified for increased housing in this case where the numbers not support the plans. It will destroy the Chilterns
Included files	
Title	Environment and Biodiversity
ID	EGS5442
Person ID	1264628
Full Name	sophie boden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>As above, it is disrespectful that this vitally important section is so far down. It is obvious that this is not one of your priorities or you would have lead with it. Then again, seeing as this proposal would destroy a significant amount of green belt land no wonder you have tried to tuck it far down.</p> <p>It is disgusting that you think it is acceptable to destroy so much green belt land.</p> <p>How have you reconciled this in yourself?</p> <p>How do you not want to fight to save the countryside for future generations?</p> <p>Your 25 year plan to improve the environment, it is easy, stop suggesting ways to destroy the environment.</p> <p>Building on greenbelt is destroying ecosystems and habitats. Have you undertaken checks on each site for protected species? No you have said developers must check (18.22). What if all your sites have protected species? Will you then decide which is the most important species to protect and build on the other land?</p> <p>This is not a well considered point.</p> <p>Increasing the amount of cars on the road leads to pollution.</p> <p>Mark Carney (ex head of Bank of England) has flagged that by 2050 climate change deaths will be like an annual covid crisis. Please rethink this plan to use so much green belt land and act on the climate crisis you have declared.</p>

Included files	
Title	Environment and Biodiversity
ID	EGS5475
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>I have commented in previous sections, that brown field sites must be built on first; and green belt and green field sites only used for building homes once there are no further available brownfield sites. The building on green sites has an impact on not just that green site but also those bordering them. One identified in Bovingdon is next to Boxmoor Trust land. When I went on a tour with the Boxmoor Trust, the man said that it is their most diverse site and has some rare butterflies. Building next door is likely to impact. This is likely to be the same for many of the other green sites. I understand housing comes first, but when there are other options these must be used first.</p> <p>'Where appropriate, applications should be supported by a site-specific flood risk assessment (FRA)'. All sites should have this and building should not take place if there is a risk of flooding.</p> <p>I agree with most of the policies and hope they will be enforced.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5481
Person ID	1264647
Full Name	Richard Burnell
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS5545
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS5631
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>This scale of development will have a huge detrimental impact on Green Belt, the Chilterns AONB and the Chilterns Beechwoods Special Area of Conservation (SAC). Dacorum is mainly a rural community (85% of Dacorum is rural) and one third of the countryside area in DBC is within the Chilterns AONB. This is a designated protected landscape of national importance , which DBC is obligated to protect and enhance. None of the proposals in the local plan will protect or enhance our local landscape.</p> <p>I understand that the local plan has been published before the completion of a screening exercise to establish the impact of the proposed developments on the Chilterns Beechwoods Special Area for Conservation (SAC). The SAC is a site of European importance for biodiversity and wildlife conservation. Following the UK's departure from the EU thhe 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. DBC is required to apply the Habitats Regulations Assessment (HRA) process to this area. The first stage is a Screening exercise which defines whether any proposal contained with Dacorum Emerging Strategy for Growth are considered likely to have any adverse effects on the SAC.</p> <p>At the time of publishing this Strategy I understand that DBC was in the process of engaging consultants to carry out this Screening.</p> <p>It is irresponsible of DBC to publish this Strategy without first carrying out the Screening Exercise which will assess the impact on the environment and biodiversity of our area.</p> <p>As well as ensuring the protection of the AONB itself, DBC must also ensure the protection of the setting of the AONB - ie the land outside the boundaries but where inappropriate development will impact on the special qualities of the AONB.</p> <p>In drawing up this plan DBC seem to have ignored the Chilterns Conservation Board (CCB) Management Plan 2019-24 and its Position Statement "Development Affecting the Setting of the Chilterns AONB (2011, revised 2014).Any local plans are obligated to take into account this management plan.</p> <p>This current local plan will result in the loss of 850 hectares of countryside and green spaces. This is a massive amount of land with accompanying loss of biodiversity.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5669
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>The Councils Green belt consultation, 2016 Arup report, recommended that land between Bell and Darr's Lane referred to as site 18 recommended that this area should remain in the Green Belt. "Durrants Lane forms a hard edge for the settlement and any loss of Green belt further west may place undue pressure on the overall integrity of the wider Green Belt in the medium to long term."</p> <p>government policy states that Green Belt should be developed only in "very special circumstances" with "substantial weight" given to harm to the Green belt (National Planning policy Framework, para. 86)</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5675
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>18.2. Asserting the protection of the natural environment unequivocally contradicts the destruction of the green belt and rural areas for development. Similarly, development does not accord with the restoration of wildlife habitats.</p> <p>18.5. Similarly, the Plan does not unequivocally demonstrate a commitment to 'conserve and enhance' natural environments and their protection from harm. Once sites are developed, habitats and the natural environment will be lost forever and will be impossible to restore.</p>
Included files	
Title	Environment and Biodiversity

ID	EGS5702
Person ID	1264710
Full Name	Jess Malcolm
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	We must put more time and energy into cleaning our streets, stopping fly-tipping and littering which injures animals and destroys our environment. Put more bins in natural areas, cameras to dissuade tippers and ensure the natural spaces are clean and safe for the wildlife! Care less about the views and the imagery and more about the wildlife and natural ecosystems!!
Included files	
Title	Environment and Biodiversity
ID	EGS5782
Person ID	1264741
Full Name	pete
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	
Included files	

Title	Environment and Biodiversity
ID	EGS5816
Person ID	1264751
Full Name	Simon Strong
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The Local Plan claims to support the environment and to support biodiversity principles. However the release of areas of Green Belt land for development is contradictory to these principles.
Included files	

Title	Environment and Biodiversity
ID	EGS5824
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I very much like the wording and sense of commitment to wildlife but again, I do not see how building a thousand homes a year will benefit our natural environment. It's not just the building. It's not just the actual homes but also the infrastructure that needs to go with all of that, such as roads, for example.

I am very concerned that once certain things have gone, we won't get them back. We currently have a fantastic abundance of wildlife in our gardens and I am not convinced that it will remain if a thousand homes are built every year in Dacorum.

Included files

Title Environment and Biodiversity

ID EGS5870

Person ID 1264752

Full Name Chris Brown

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

This scale of development will have a huge detrimental impact on Green Belt, the Chilterns AONB and the Chilterns Beechwoods Special Area of Conservation (SAC). Dacorum is mainly a rural community (85% of Dacorum is rural) and one third of the countryside area in DBC is within the Chilterns AONB. This is a designated protected landscape of national importance, which DBC is obligated to protect and enhance. None of the proposals in the local plan will protect or enhance our local landscape.

As well as ensuring the protection of the AONB itself, DBC must also ensure the protection of the setting of the AONB - ie the land outside the boundaries but where inappropriate development will impact on the special qualities of the AONB.

In drawing up this plan DBC seem to have ignored the Chilterns Conservation Board (CCB) Management Plan 2019-24 and its Position Statement "Development Affecting the Setting of the Chilterns AONB (2011, revised 2014). Any local plans are obligated to take into account this management plan.

This current local plan will result in the loss of 850 hectares of countryside and green spaces. This is a massive amount of land with accompanying loss of biodiversity.

I understand that the local plan has been published before the completion of a screening exercise to establish the impact of the proposed developments on the Chilterns Beechwoods Special Area for Conservation (SAC). The SAC is a site of European importance for biodiversity and wildlife conservation. Following the UK's departure from the EU 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. DBC is required to apply the Habitats Regulations Assessment (HRA)

process to this area. The first stage is a Screening exercise which defines whether any proposal contained with Dacorum Emerging Strategy for Growth are considered likely to have any adverse effects on the SAC.

At the time of publishing this Strategy I understand that DBC was in the process of engaging consultants to carry out this Screening.

It is irresponsible of DBC to publish this Strategy without first carrying out the Screening Exercise which will assess the impact on the environment and biodiversity of our area.

Included files

Title Environment and Biodiversity

ID EGS5886

Person ID 1264354

Full Name Juliet Penaliggon

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Environment and Biodiversity comment

This whole section of the plan supports the valuable nature of the Chiltern Beeches SAC and AONB. This flies completely in the face of the rest of this development plan which is based on the destruction of 850 hectares of green belt land on the doorstep of these areas, in turn having a detrimental impact upon them. I understand destroying green belt so near to such areas is also not legally justified under 'special circumstances' for green belt development.

Housing projections need to be halved based on the 2018 ONS numbers and a review of brown field sites needs to be done post pandemic, to significantly reduce this land grab.

In addition, the Thakeham / Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.

Included files

Title Environment and Biodiversity

ID EGS5964

Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>The areas around Tring border AONB's and their special habitats. By encroaching onto green belt any buffer zones are lost. The impact is both physical, through loss of open fields, hedgerows and habitats, as well as visual due to the fact that the sites proposed in Tring are at a higher elevation than the existing town and as such will dominate the view from the escarpment to the south of the town as well as from Ivinghoe Beacon and Ashridge.</p> <p>This is at odds with policy DM27.</p> <p>In the drainage system around Marshcroft Lane Tring there is the potential for protected species, and so it is vital that a suitable survey is carried out. Additionally, this area is known to flood on a regular basis, and any development of this landscape will additionally affect the struggling natural drainage and field wash-off. Water quality of the drainage into the Grand Union canal from this site is vital to the existence of the wildlife that thrives along the canal.</p> <p>A biodiversity net gain is no compensation for the destruction of open green belt habitats as it takes many years for a new landscape to evolve and mature sufficiently to replace what was lost. An example is the loss of ancient hedgerows at Roman Park Tring which have been replaced by fences and newly planted hedge plants which look very sparse and unsupportive of wildlife.</p> <p>Green spaces do not have to be developed, they are richer for the fact that they have evolved over millennia and form part of the natural support for flora and fauna in the region.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS5969
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Policy DM33 does not refer to the increased demand for water which will result from these proposals. The Environment Agency has limited the amount of water which Affinity can abstract from aquifers. The 3 rivers Ver, Garde and Bulbourne are chalk streams which must be protected as a rare habitat. No weight seems to have been given to the preservation of these important habitats. The development is therefore unsustainable.
Included files	
Title	Environment and Biodiversity
ID	EGS6109
Person ID	1264816
Full Name	Christopher Nicholls
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	It is not clear how you are going to protect or replace the existing environment. The use of farmland for instance is a disaster.
Included files	
Title	Environment and Biodiversity
ID	EGS6117
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Protect the nice parts of Dacorum please.
Included files	
Title	Environment and Biodiversity
ID	EGS6197
Person ID	1264872
Full Name	Ben Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>This whole section of the plan supports the valuable nature of the Chiltern Beeches SAC and AONB. This flies completely in the face of the rest of this development plan which is based on the destruction of 850 hectares of green belt land on the doorstep of these areas, in turn having a detrimental impact upon them. I understand destroying green belt so near to such areas is also not legally justified under 'special circumstances' for green belt development.</p> <p>Housing projections need to be halved based on the 2018 ONS numbers and a review of brown field sites needs to be done post pandemic, to significantly reduce this land grab.</p> <p>In addition, the Thakeham / Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	

Title	Environment and Biodiversity
ID	EGS6222
Person ID	1261819
Full Name	Alex Rathmell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	
Included files	

Title	Environment and Biodiversity
ID	EGS6242
Person ID	1264668
Full Name	Geraint Cooksley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>The following points should be taken into account and guaranteed in a prequalification of bidders:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Guarantee the protection of existing natural environments (natural vegetation and ecosystems) and expansion of natural environment in the areas to be developed by rewilding and connecting in it to areas already protected in the Chilterns (AONB) effectively increasing the area of natural ecosystems as a give back to the community.

- Demand the use of green infrastructure in the developments: green walls, green roofs, wild flower verges, Permeable Pavements, Green Streets and Alleys, Green Parking, green bridges and natural habitats corridors etc...
 - All proposals to be assessed first on environmental impact assessment via a prequalification of developers focusing on protecting natural vegetation areas:
- Sustainability of ecosystems to protect endemic plants and animals should be part of it.
- Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted.
- All major development will be required to deliver an overall net gain in biodiversity of 15% or more, determined by applying the Natural England Biodiversity Metric 2.0 Calculator.
 - Air Quality Management Areas (AQMAs) in each High St of towna in Dacorum to monitor decrease in pollution.
 - Polluted waters discharge to non-mains drainage prohibited.
 - Lowest light pollution as possible- dim/sensor low voltage lights.
 - Tree protection by guaranteeing an Arboricultural Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboricultural Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.
 - Landscaping: demand ecological connectivity by integrating planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old)
 - Demand the document with Detailed changes and other corrections to the Green Belt at the Publication Stage of the Local Plan once fully taken into account the results of this public consultation and when Growth Area allocations in the Green Belt are confirmed- prior any development procurement.
 - Overall Green, flexible and adjustable plan. Plan says that sites removed from the Green Belt will be managed as countryside until required for development- why not release the land as needed in phases: split in phases allows to change strategy if house demand decrease? So more green belt land is protected?
 - Ifvillages have to be developed then reclaim an equal amount of land for rewilding- larger natural forested area.
 - Prioritise always redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings).

Included files

Title Environment and Biodiversity

ID EGS6253

Person ID 1264834

Full Name	Ilina Jha
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Not releasing areas of the Green Belt for development will preserve the environment and biodiversity of the Green Belt.
Included files	
Title	Environment and Biodiversity
ID	EGS6255
Person ID	1264030
Full Name	Sean Collier
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Though I agree with developing more affordable housing, aiming to conserve and enhance the areas character and remoteness is contradictory to building on significant amounts of Green Belt land.
Included files	
Title	Environment and Biodiversity
ID	EGS6299
Person ID	1264884
Full Name	Max Ansell

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Dacorum's Green Belt, ancient hedgerows, local wildlife corridors and biodiversity need to be protected. This is part of the government's environmental policy and net carbon zero targets and Dacorum's climate change strategy. The plans aim to build on Green Belt and then try to replayce it with local paths and new wildlife corridors, rather than preserving what we have. Berkhamsted and Northchurch residents value our stunningviews across the valley to green fields and woodlands, all with well frequented footpaths. This is all crucial to our mental health and well-being.
Included files	
Title	Environment and Biodiversity
ID	EGS6334
Person ID	1264726
Full Name	Annie Heaton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	This 10% net biodiversity national requirement and it application in the Local Plan is welcome. However, it is not clear which aspects of the Plan will fall under this requirement. Not only major developments, but all developments that change the natural environment should be considered in the light of the underlying biodiversity value. Extending the net gain requirement to all developments would generate multiple benefits for the residents of Dacorum, since biodiverse areas provide so many other forms of value, relating to air quality, recreation, culture, and health.

As a first step, DBC should generate a **published biodiversity baseline of all natural assets to be affected by the Plan**. Such an assessment appears to be absent from the Plan. Even a list of all nature reserves, local wildlife sites and SSSIs does not appear to be included in the Plan. These are the most important biodiversity assets within the Borough, but a more comprehensive biodiversity register is needed – including woodland, scrubland, hedgerows, soils - to ensure a full understanding of the biodiversity value that nature provides to the residents and businesses of Dacorum.

A requirement for assessments of biodiversity value change to be undertaken, verified by an independent third party, and published as part of planning proposals, also appears to be absent from **Policy DM30** referred to in the Plan.

The Natural England Biodiversity Metric 2.0 Calculator is not scheduled to be published until spring 2021. Nonetheless, there is a growing body of expertise that is able to undertake such assessments, with tools such as: Pollution Removal by Vegetation (ceh.ac.uk)_ORVal Outdoor Recreation Valuation (exeter.ac.uk) and the Carbine forest accounting model . Others are available on the Enabling a Natural Capital Approach (ENCA) government website.

Water

The Local Plan **does not explain how Policy DM33 (on the protection that groundwater supplies and chalk streams) can be implemented in the face of the the very high number of new homes to be developed.**

What plans are there to guarantee sufficient water supplies whilst observing this policy? How will Dacorum’s water supplies be safeguarded from the effects of increased water abstraction from local aquifers? This is an extraordinary omission, given the proposed growth of the borough, particularly given the international significance of the chalk streams which lie within Dacorum and to which DBC has a responsibility to protect.

Furthermore, there are **no proposals to improve or ensure water quality** for the residents of Dacorum by preventing pollution from existing storm drains. At the present time storm drains e.g. in Boxmoor are often unable to cope with the volume of water flows from heavy rainfall since because DBC capacity to clear them is inadequate. This can create flash floods, as occurred in September 2020, which damaged property and could impact on house prices.

Similarly, pollution caused by the run-off from fertilisers used in the agricultural sector is not addressed in the Plan. This may have harmful and potentially toxic effects for local wildlife, livestock and pets. Whilst this is the responsibility of the Environment Agency, the Local Plan should indicate how DBC will work with the Environment Agency to strengthen their ability to respond to such measures.

Included files

Title	Environment and Biodiversity
ID	EGS6344
Person ID	1264914
Full Name	Malcolm HULL

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>We welcome the commitments to sustainability and improving biodiversity. It is important to recognise that there has been a considerable loss of biodiversity in the district in recent years. At least 10 butterfly species (25% of the total) have died out in the district since World War 2. And individual numbers of butterflies and moths have dramatically reduced over the same period. Habitat loss and modern agricultural practices are the principal causes.</p> <p>In order to halt and reverse these trends the main priorities should be to</p> <ol style="list-style-type: none"> 1) Conserve existing valuable habitats, particularly woodland & hedgewows, chalk grasslands, wild flower meadows and heath/acid grassland. All land should be assessed for habitat quality prior to any development designation or planning consent 2) Improve management of existing sites - this requires a properly produced management plan. Also funding, which needs to be secured either from developers or grants and ringfenced for example by setting up Trusts to ensure future financial sustainability 3) Creation of landscape scale conservation by restoring/creating a network of sites, linked through properly managed green corridors 4) Enforcing the requirements for net biodiversity gain in a sensitive way which provides advice and encouragement to developers to create sustainable new habitat. Dacorum is fortunate in having considerable areas of chalk near the surface. Several excellent new habitats have been created where cuttings through the chalk have been made, for example along the A41. More opportunities like this should be actively promoted. <p>We have read the document entitled Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report and Appendices. We have a number of specific comments on this.</p> <p>s4.3, Table 4.1 - We welcome this approach</p> <p>Appendix B1 - The figures showing biodiversity improvements and losses relate only to a very recent period. Looked at in the context of the last century, the district has suffered massive biodiversity losses of butterflies and moths</p> <p>The Hertfordshire Biodiversity Action Plan 2006 is now 15 years old and some of its conclusions outdated. For butterflies and moths, Butterfly Conservation's UK Conservation Strategy 2025 provides a more up to date statement of the current</p>

status of endangered

species https://butterfly-conservation.org/sites/default/files/2018-11/bc_2025_conservation_strategy.pdf

Our database holds detailed records for Dacorum and can most easily be accessed on application to the Herts Environmental Records Centre, hosted by the Herts & Middx Wildlife Trust. There are several priority butterfly species within Dacorum and it is important that their requirements are identified and met as part of the planning process.

Table B1 - We are concerned at the continuing unfavourable status of the SSSIs at Aldbury Nowers and Tring Park. We have worked closely with both HMWT and Woodland Trust respectively to achieve management improvements. There have been improvements at both locations in recent times and we will continue to support both organisations efforts. We suggest that the objective of achieving 100% favourable status of all SSSIs should be a major goal of this plan.

The document lists a number of other nature reserves in the district. This omits to mention Butterfly Conservations own reserve which is known as Millhoppers Pasture, Watery /Astrope Lane, Willstone. We own and manage this three acre site, which deserves to be mentioned in your document. The site was originally purchased thanks to a sizable donation from Dacorum

B1.2.3 Priority Butterflies which should now be included in tghis list include

Dingy Skipper White-letter Hairstreak and White Admiral. Neither Brown Hairstreak or Duke of Burgundy have been present in the last twenty years, but there are efforts being made to encourage their return, so we suggest they are retained on your list. The number of Priority moths is more extensive and we are happy to provide details if you wish.

Included files

Title Environment and Biodiversity

ID EGS6389

Person ID 1262933

Full Name James Cunningham

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment	Developing Tring is NOT protecting an area of outstanding natural beauty. You'll be able to see it from Ivinghoe Beacon.
Included files	
Title	Environment and Biodiversity
ID	EGS6464
Person ID	1264916
Full Name	Kathryn Spall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS6480
Person ID	1264936
Full Name	Jane Cracknell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	To protect biodiversity green belt should be protected.
Included files	
Title	Environment and Biodiversity
ID	EGS6491
Person ID	1264971
Full Name	Louise Watson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS6500
Person ID	1264951
Full Name	Chris Perks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	<p>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.</p> <p>It is, frankly, bizarre to claim that this proposal is sustainable and takes into account climate change, the environment and biodiversity, when one of its key suggestions is to permanently destroy large areas of green belt land.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS6515
Person ID	1264906
Full Name	carol nutkins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	It will be important to maintain Trings wildlife corridors. Wild flower planting, Bee friendly and planting of trees.
Included files	
Title	Environment and Biodiversity
ID	EGS6562
Person ID	1264970
Full Name	Frankie Mitchell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Environment and Biodiversity comment	<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>
Included files	
Title	Environment and Biodiversity
ID	EGS6588
Person ID	1263380
Full Name	Martin Warden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS6593
Person ID	1264731
Full Name	Graham Smith
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Policy DM27 This policy is NOT being applied to proposed developments TR01 and TR03 around Tring as they all affect the setting of the AONB and yet they do not provide major benefits to the area that cannot be achieved elsewhere in Dacorum.
Included files	
Title	Environment and Biodiversity
ID	EGS6599
Person ID	1264697
Full Name	Nicholas Wood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>All very laudable. And all totally at odds with your plans to push the largest number of housing units on Dacorum that you possibly can, using figures that are based on out of date metrics pre Brexit and pre Covid.</p> <p>You state that you are trying to avoid ' increased visitor pressure ' on the Chilterns AONB. Then I suggest you build as few houses as you can within 10 minutes drive of it. This is not rocket science. More residents means more visitors. Yet again I have to point out that your forecasts for housing need are based on figures that are 5 years old at least and ignore the following facts. 1 - it is estimated that 1.3M EU citizens have left them UK post Brexit and Covid. 2 - the home working revolution caused by Covid means there will be much less demand for housing in traditional commuter towns like Tring and Berkhamsted. 3 - vast swathes of town centres are going to come available for housing as physical retail is destroyed by online shopping. 4 - the end of EU free movement to the UK means population growth will be massively subdued.</p> <p>Please take these multiple and momentous changes in the fabric of our society into account. Plan less housing and save more green belt. That way you truly can respect the ' Environment and Biodiversity' you claim to treasure.</p>

Included files	
Title	Environment and Biodiversity
ID	EGS6604
Person ID	1265011
Full Name	Rebecca Staples
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	A huge concern to hear that there are plans in place to build on green belt land. The green spaces around the town are so precious as views, walking spots and from an environmental pov. These are undoubtedly home to much wildlife and should be left to thrive.
Included files	
Title	Environment and Biodiversity
ID	EGS6608
Person ID	1265007
Full Name	Duncan Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Environment and Biodiversity comment	

Included files	
Title	Environment and Biodiversity
ID	EGS6615
Person ID	1264923
Full Name	Ken Douglas
Organisation Details	Secretary TRING IN TRANSITION
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Section 18 ‘Environment and Biodiversity’</p> <ul style="list-style-type: none"> Tring is uniquely surrounded by AONB and Green Belt countryside. With this in mind I'd argue that it deserves a much higher standards of "green infrastructure" (than is explicit) for the housing developments in general. However, despite admirable, and welcome, aspirations (18.1 and 18.11) there is nothing that will help ensure that any of this will happen....again, why not be more explicit? <p>For example, Section 18.19 states, ‘We will also seek opportunities to create new spaces for nature conservation, such as informal green infrastructure managed for biodiversity benefit, or Local Nature Reserves (LNRs).’ Before pressing ahead with Green Belt development there should be clarity on how this aspiration will be met – whether as reserved areas with Tr01 Tr02 and Tr03 or in the surrounding land, as required by NPPF paras 147, 99/100.</p> <ul style="list-style-type: none"> Tring is surrounded by AONB and Green Belt countryside. This natural environment of outstanding beauty deserves and needs an outstanding design, including an excellent green infrastructure for the housing developments east of Tring, Tr01, Tr02 and Tr03. However, despite admirable, and welcome, aspirations on comments such as 1 and 18.11, TinT can find little evidence that the Plan includes positive action on green infrastructure. <p>For example, Section 18.19 states, ‘We will also seek opportunities to create new spaces for nature conservation, such as informal green infrastructure managed for biodiversity benefit, or Local Nature Reserves (LNRs).’ Before pressing ahead with Green Belt development there should be clarity on how this aspiration will be met – whether as reserved areas with Tr01 Tr02 and Tr03 or in the surrounding land, as required by NPPF paras 147, 99/100.</p>

Included files	
Title	Environment and Biodiversity
ID	EGS6616
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Aspiration is not the same as policy and there is no clarity on how the aspirations will be achieved or their impact measured.
Included files	
Title	Environment and Biodiversity
ID	EGS6649
Person ID	1264920
Full Name	Anna Wellings Purvis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	While it is good to see the environment get lip service, these proposals do not protect green spaces in Hemel Hempstead. But more worryingly, air quality will reach levels poisonous to small children, dogs and frequent drivers passing main roads because people will need to come and go from these homes, causing more traffic jams. Providing more frequent public transport, raised walkways and vertical gardens would help a lot here. Planting trees in the Chilterns is all very

well (is it counted double with replacements for HS2) but doesn't stop us getting cancer in Adeyfield or Bennets End, where we face a double whammy from increased traffic and loss of plants.

Included files

Title Environment and Biodiversity

ID EGS6698

Person ID 1265019

Full Name Yvonne Brener

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment I endorse the response of the chiltern countryside group

Included files

Title Environment and Biodiversity

ID EGS6800

Person ID 1265036

Full Name Tom Burrows

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment	The size of the developments will have devastating effects on the local environment and habitats of natural wild life.
Included files	
Title	Environment and Biodiversity
ID	EGS6810
Person ID	1261827
Full Name	Ian Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<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>A great resource that this will trash. Please see the CCG's response to this and which I endorse.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS6862
Person ID	1261257
Full Name	Simon Tuff
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Environment and Biodiversity comment	<p>18.7 [2006] and 18.9 [2011] are appear some what out of date. Are they not due for revision etc.?</p> <p>DM35 talks about a range of environmental protections but not predation by domestic pets. It is estimated that they kill 27 million birds a year in the uk. With pet ownership on the increase during the pandemic this problem is set to become more acute. Some consideration should be given to how this could be managed as the local environment is placed under pressure especially in an area which is an important for its bird habitats.</p> <p>https://www.bbc.co.uk/programmes/m0004md0</p>
Included files	
Title	Environment and Biodiversity
ID	EGS6903
Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Environment and Biodiversity comment	<p>Infill of open spaces in around the market towns of Tring and berkhamsted in particular will remove vital green belt protection and biodiversity within the children's. it should not be allowed.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS6916
Person ID	1265094
Full Name	Rebecca Gurnham
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>There needs to be legally binding language to protect these vulnerable environmental assets: "</p> <p>Where we become aware of ancient trees not previously identified and under threat from development, a tree preservation order will likely be made.</p> <p>18.19 We will also seek opportunities to create new spaces for nature conservation, such as informal green infrastructure managed for biodiversity benefit, or Local Nature Reserves (LNRs).</p> <p>"likely" and "seek" are weak and untrustworthy choices of semantics.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS6940
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>I don't feel that a comprehensive assessment of biodeiversity and biodiversity valaue cahgen ahs been included or published as part of the plan...so how can we understand if the proposal has met the 10% national biodiversity national requirement.</p> <p>There will also be further pressure and degration of the rive gade which is a globally rare chalk stream. Increased demand for water and inrease in temperatue will damage our local biodiversity.</p>
Included files	

Title	Environment and Biodiversity
ID	EGS6978
Person ID	1265105
Full Name	Jonathan Tay
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Increasing the Borough population by ~30-35% is not going to help the environment or biodiversity. Concreting over fields and hedges, increase in pollution and rubbish/litter etc. The Council has clearly thought a lot about this issue, but the overarching aim to build so many new homes means the environment and biodiversity will only be harmed further.
Included files	
Title	Environment and Biodiversity
ID	EGS7116
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I support all policies which themselves support the protection and enhancement of the natural environment and the biodiversity within. The problem with the policies in this section is that I feel they will be overlooked at the expense of other policies involving the development of housing and other hard surfaces. This has certainly been the case with all previous local plans. I am against development of the Green Belt. It was put there for good reason. As a Geographer

with a particular interest in rivers, I support Policy DM 33, particularly 1c....but it must come before any urban development , otherwise the destruction of our globally rare chalk streams will continue.

Included files

Title Environment and Biodiversity

ID EGS7135

Person ID 1265133

Full Name Sarah Storey

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment Please see comments above. Proposed development in Tring is unjustifiable and disproportionate.

Included files

Title Environment and Biodiversity

ID EGS7195

Person ID 1265142

Full Name Alan Anderson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment	Re 18.17 / DM28, on the policies map I cannot see the woodland known as The Nucket along the southern side of the semi-rural section of Rucklers Lane, Kings Langley (between the A41 & the cul-de-sac Roundwood). In previous Local Plans this woodland has been identified as either ancient woodland or a nature reserve warranting protection, but I cannot see it in this draft. I feel strongly this should be included/protected.
Included files	
Title	Environment and Biodiversity
ID	EGS7210
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The policies themselves seem fine, but the Plan seems to fly in the face of them if I'm honest, particularly for Tring and Berkhamsted.
Included files	
Title	Environment and Biodiversity
ID	EGS7244
Person ID	1264956
Full Name	Caroline Heard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Environment and Biodiversity comment	
Included files	
Title	Environment and Biodiversity
ID	EGS7304
Person ID	358532
Full Name	Ms Gillian Culham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>P127 – Light Pollution</p> <p>The street lamps can be so bright – it prohibits the study of the night sky, another problem when house lights are activated on the passing of cars – and pedestrians “Blackpool illuminations” are forthcoming – this can create being woken up throughout the night – even with blackout coverings. There needs to be a limit in meters how far the source can reach, I don’t think this happens at present.</p> <p>Improvement of local hedges – wanted, important from the Northchurch Baptist church area. It has not been looked after properly. Its bene left to get wide (become bare at base), lost the height (along the flats)– there is another hedge, in new road – cemetery and going along to the mobile home park in Northchurch. There are old apple trees in the old A41 road one lost near midcote way bus stop and one going along to Bourne end near the church car parking area and London Road/Broadway area – they may even be a pear tree somewhere along there too.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS7312
Person ID	1265182

Full Name	JAMES NODDER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>There should be more emphasis on protecting the environment.</p> <p>Avoiding use of greenfield sited, minimising the effects of pollution, Make “Affordable housing” truly affordable to most local people.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS7574
Person ID	1265607
Full Name	Victoria Hayes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<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</p>

vehicles coming through the village en route to and from the airfield industrial estate on Cheddington Lane. This would be the route taken to Cheddington station, the proximity of which is mentioned as a mitigating factor in reducing the number of car journeys. The road into Wingrave is very narrow in places and would not be suitable for a large number of additional vehicles.

Secondly, Long Marston has an ongoing issue with flooding. Much of the village has had several days without mains drainage already this year and two households have been out of their homes since October after a flooding event. Both properties have had water in again since. If much of our surrounding countryside is built on then the volume of water running into the centre of the village is going to increase. The fields hold a lot of water during the winter and are very boggy underfoot.

Lastly, the impact on the local wildlife would be atrocious. Personally I have seen two species of deer, hares and many different insects and birds in this area over the last year. Destruction of their habitat would be an extremely sad loss for Long Marston and the whole of Dacorum.

Included files

Title Environment and Biodiversity

ID EGS7633

Person ID 1265747

Full Name STEPHANIE BRADLEY

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

I would like to make the following points:

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.

The plan was presented in a way that was not user friendly, salient points were not easily picked out, even by those who are highly educated, let alone those are not. This type of plan should be presented in a clear and concise but fully explicit manner such as an exhibition, with displays that are accessible to all (clearly not possible in a pandemic), for all areas of Dacorum.

The response portal is not at all user friendly and has put many people off responding.

The plan and consultation was not widely advertised and only after much petitioning about this point was literature sent to every household. The literature sent was wholly inadequate and set to mislead about some of the most important (and controversial) points in the plan.

The pandemic has resulted in massive changes in lifestyle and these are not reflected in the plan, therefore it should be revised in light of these major changes to how we live and work.

It makes no sense to use the 2014 ONS figures with the incorrect algorithm when more realistic projected numbers can be based on the more recent 2018 projections. Using the 2014 figures does not provide an “objectively assessed need”. Consequently the numbers projected are far too high.

Villages will cease to be self-sustaining and become car-linked hubs to the main towns.

Social housing needs for the area will not be met by this plan.

The projected use of greenbelt land should not be pursued and the greenbelt should be protected. Alternative locations must be sourced as a priority and the greenbelt protected.

There is no mention of the Glover report which proposes that the AoNB becomes a National Park. This plan goes against this report.

Climate Change considerations are key. The plan does not address how house building and subsequent use, transport and infrastructure will align with the Government 2025 net zero target. The carbon cost of using greenbelt land is key.

Many of the documents referenced are in draft form and not up to date., including the habitats assessment (2006). There are no Habitats Regulations Assessment Documents .

Biodiversity value change assessments should be included and verified independently.

Most of the developments will be taken by commuters rather than locals as not affordable for locals. Priority and affordability for locals should be key.

Inadequate transport and infrastructure: Provision must be made for sustainable transport from existing and new developments. Most of the new developments are out of town and the car cannot be prioritised for travel to stations (most of these developments will be for commuters and few locals). Bicycle travel must be prioritised. I am too scared to cycle on the roads. My husband has had 3 serious accidents (broken collarbones twice) due to potholes.

The people of Dacorum must have this plan explained to them so that they can understand the full impact of the plan proposals and hopefully realise that it is highly detrimental to future generations and can challenge it accordingly. Having spoken to them, almost all of my friends have no real idea about any of it and the seriousness of it.

The points above should be addressed and the plan put out for consultation in a correct manner once the world returns to some sense of normal... our future depends on it.

Included files

Title Environment and Biodiversity

ID EGS7721

Person ID 1265768

Full Name Lisa Poulton

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

Environment and Biodiversity comment	<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"> - 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	Environment and Biodiversity
ID	EGS7752
Person ID	1265780
Full Name	James McDonald
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>I would like to register the following comments on the local plan.</p> <p>General:</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.

Specific:

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.

Thank you for taking these comments into consideration.

Included files	
Title	Environment and Biodiversity
ID	EGS7813
Person ID	1265909
Full Name	Peter Evans
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Environment and Biodiversity comment	<p>Environment and Biodiversity.</p> <p>We are in a climate emergency and this should be the highest context for any developments or growth plan.</p> <p>The plan however gives little detail about the potential impact of developments on biodiversity and overall environment. It also does not commit to any detailed strategies for enhancing and protecting biodiversity and historic environments. The plan would create irreversible harm to Green Belt land and AONB within Tring with the cumulative effect of all of the building, population increase, roads and traffic alongside the land loss compounding this threat. Community human health is also at risk with the loss of green spaces, increased pollution and taking away from attractive and historic environment.</p> <p>Opportunities for nature conservation should be found, ahead of any development.</p> <p>Government policy gives a responsibility to councils to show why there are exceptional circumstances for using Green Belt land for developments. As above, I do not believe the council has shown evidence for the huge increase in homes in Dacorum overall, and particularly the disproportionate number of these in Tring.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS7927
Person ID	1262335
Full Name	Penelope Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> • 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 there is 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.

Included files

Title Environment and Biodiversity

ID EGS8011

Person ID 398885

Full Name Mr Barry Smith

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

ENVIRONMENTAL

Currently Dacorum and surrounding areas are home to many unique flora and fauna species not found anywhere else in the country. Uncontrolled development and increase in residents will not doubt have a huge impact on the biodiversity of the area ,as in many other parts of the UK, and to lose further species in unacceptable. All areas such as Green Belt, AONB , National Trust , Wildlife Trusts, Conservation areas should not be subject to development. The pandemic has reinforced how critical these green spaces are for our physical and mental well-being. Surely all developments must primarily use existing brownfield sites and soon to be redundant office spaces.

Included files

Title Environment and Biodiversity

ID EGS8280

Person ID 1266168

Full Name Lisa McNamara

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>We are writing to express our objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth. The sheer scale of the proposed development will have a devastating effect on the environment and also the shape and nature of our towns.</p> <p>The areas of concern are:</p> <ul style="list-style-type: none"> • Loss of Green belt land within the Chilterns which is an area of Outstanding Natural Beauty • Impact on environment with loss of green space, loss of trees and damage to wildlife habitats • The sheer scale of the proposed development would result in an over-provision of housing and this would have an impact on the infrastructure and local community of our towns • The lack of brownfield regeneration proposals. • Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny. • The Plan is at odds with the recent government desire to address the imbalance of investment between the north and south of England. Post-Covid in particular it is likely that there will be a reduced requirement to live and work in London and the South East. <p>Berkhamsted, Tring and surrounding towns and villages enjoy green spaces and this is what makes them attractive to the residents. If this green space is turned into residential areas, we will be nothing more than an extension to London with built up and cramped living. This will change the shape and nature of the towns we love. Green Belt was introduced for a reason... to prevent over-building and protect our green spaces... this must remain.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS8281
Person ID	1266169
Full Name	Sarah Knowles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Environment and Biodiversity comment	<p>We are writing to express our objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth. The sheer scale of the proposed development will have a devastating effect on the environment and also the shape and nature of our towns.</p> <p>The areas of concern are:</p> <ul style="list-style-type: none"> • Loss of Green belt land within the Chilterns which is an area of Outstanding Natural Beauty • Impact on environment with loss of reen space, loss of trees and damage to wildlife habitats • The sheer scale of the proposed development would result in an over-provision of housing and this would have an impact on the infrastructure and local community of our towns • The lack of brownfield regeneration proposals. • Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny. • The Plan is at odds with the recent government desire to address the imbalance of investment between the north and south of England. Post-Covid in particular it is likely that there will be a reduced requirement to live and work in London and the South East. <p>Berkhamsted, Tring and surrounding towns and villages enjoy green spaces and this is what makes them attractive to the residents. If this green space is turned into residential areas, we will be nothing more than an extension to London with built up and cramped living. This will change the shape and nature of the towns we love. Green Belt was introduced for a reason... to prevent over-building and protect our green spaces... this must remain.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS8293
Person ID	1266171
Full Name	Patrick and Gillian Wilks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity 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 Environment and Biodiversity

ID EGS8345

Person ID 1266200

Full Name ROGER HANDS

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Section 18.2 says that the Local Authorities have a duty to conserve biodiversity under the Natural Environment and Rural Communities Act (2006) how will this be achieved..... the refurbishment of the white bridge in Gadebridge Park resulted in the removal of in channel material immediately upstream and downstream of the bridge.... Surely the marginal vegetation should have been replanted to preserve the local biodiversity?</p> <p>Section 18.21 mentions protected species, badgers should be added to this list</p> <p>Section 18.41 Says Dacorum will work with partners to help restore rivers how will they do this, experience of a restoration project on the Gade showed that the planners were far from helpful and in fact caused additional costs to at least two projects. How will Dacorum ensure that in future it will support such restoration projects and that comments on planning applications are timely and correct.</p> <p>Pg 122 Policy DM33 lists objectives to Protect and enhance river character and water environment to avoid the need to abstract water from the ground. However, building 10,688 new houses will require an additional 1.7 Ml/d of water to be abstracted. In AMP6 2015-2020 Affinity reduced abstraction at their North Hemel Hempstead pumping station and the closed the abstraction point to the north of St Albans. How will this additional housing fit in with the policy of reducing abstraction? What are Dacorum doing to encourage the reduction in per capita water use?</p> <p>Pg 124 Policy DM 34 Flood Risk Protection: there is no mention of the maintenance of SuDs, who will be responsible for this?</p>
Included files	
Title	Environment and Biodiversity
ID	EGS8359
Person ID	211117
Full Name	Mr Michael Heylin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	<p>Section 18.2 says that the Local Authorities have a duty to conserve biodiversity under the Natural Environment and Rural Communities Act (2006) how will this be achieved..... the refurbishment of the white bridge in Gadebridge Park resulted in the removal of in channel material immediately upstream and downstream of the bridge.... Surely the marginal vegetation should have been replanted to preserve the local biodiversity?</p> <p>Section 18.21 mentions protected species, badgers should be added to this list</p> <p>Section 18.41 Says Dacorum will work with partners to help restore rivers how will they do this, experience of a restoration project on the Gade showed that the planners were far from helpful and in fact caused additional costs to at least two projects. How will Dacorum ensure that in future it will support such restoration projects and that comments on planning applications are timely and correct.</p> <p>Pg 122 Policy DM33 lists objectives to Protect and enhance river character and water environment to avoid the need to abstract water from the ground. However, building 10,688 new houses will require an additional 1.7 Ml/d of water to be abstracted. In AMP6 2015-2020 Affinity reduced abstraction at their North Hemel Hempstead pumping station and the closed the abstraction point to the north of St Albans. How will this additional housing fit in with the policy of reducing abstraction? What are Dacorum doing to encourage the reduction in per capita water use?</p> <p>Pg 124 Policy DM 34 Flood Risk Protection: there is no mention of the maintenance of SuDs, who will be responsible for this?</p>
Included files	
Title	Environment and Biodiversity
ID	EGS8374
Person ID	1266205
Full Name	DI HAMMOND
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Section 18.2 says that the Local Authorities have a duty to conserve biodiversity under the Natural Environment and Rural Communities Act (2006) how will this be achieved..... the refurbishment of the white bridge in Gadebridge Park resulted in the removal of in channel material immediately upstream and downstream of the bridge.... Surely the marginal vegetation should have been replanted to preserve the local biodiversity?</p>

Section 18.21 mentions protected species, badgers should be added to this list

Section 18.41 Says Dacorum will work with partners to help restore rivers how will they do this, experience of a restoration project on the Gade showed that the planners were far from helpful and in fact caused additional costs to at least two projects. How will Dacorum ensure that in future it will support such restoration projects and that comments on planning applications are timely and correct.

Pg 122 Policy DM33 lists objectives to Protect and enhance river character and water environment to avoid the need to abstract water from the ground. However, building 10,688 new houses will require an additional 1.7 Ml/d of water to be abstracted. In AMP6 2015-2020 Affinity reduced abstraction at their North Hemel Hempstead pumping station and the closed the abstraction point to the north of St Albans. How will this additional housing fit in with the policy of reducing abstraction? What are Dacorum doing to encourage the reduction in per capita water use?

Pg 124 Policy DM 34 Flood Risk Protection: there is no mention of the maintenance of SuDs, who will be responsible for this?

Included files

Title Environment and Biodiversity

ID EGS8383

Person ID 399112

Full Name Mrs Sally Smith

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

Environment and Biodiversity comment

ENVIRONMENTAL

Currently Dacorum and surrounding areas are home to many unique flora and fauna species not found anywhere else in the country. Uncontrolled development and increase in residents will not doubt have a huge impact on the biodiversity of the area ,as in many other parts of the UK, and to lose further species in unacceptable. All areas such as Green Belt, AONB , National Trust , Wildlife Trusts, Conservation areas should not be subject to development. The pandemic has reinforced how critical these green spaces are for our physical and mental well-being. Surely all developments must primarily use existing brownfield sites and soon to be redundant office spaces.

Included files	
Title	Environment and Biodiversity
ID	EGS8406
Person ID	1266232
Full Name	BARBARA FLINT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>I would like to express my concerns with regard to the Local Plan and the consultation. First of all in this current period of crisis I think it would have been sensible to have extended the consultation period beyond the revised end date of 28 February.</p> <p>I am also concerned that, whilst numerous methods seem to have been used to disseminate information, the brochure clearly detailing all the areas of proposed building was not sent out to residents until the last week of February.</p> <p>We have been made to realise during the last year the vital importance of our local open spaces and the protection which needs to be maintained of our Green Belt and areas of outstanding natural beauty. Once these are lost they can never be recovered and are more and more essential to maintain and protect in our overcrowded island. I understand that local authorities have the flexibility to restrict the scale of development when impacts on Green Belt etc are taken into consideration. Surely another impact of the current crisis is a chance to re-think and reuse current office and brownfield sites before destroying further open or agricultural land.</p> <p>Current environmental and infrastructure impacts should weigh heavily in all the planning decisions. The plans need to look carefully not only at the impact on roads, power, support agencies, water extraction and disposal etc but the wider requirements of such areas as climate change obligations.</p> <p>I trust that this consultation is a realistic opportunity for concerned residents to express their opinions and that the ideas and thoughts of local people will be taken into account.</p>

Included files	
Title	Environment and Biodiversity
ID	EGS8458
Person ID	1266285
Full Name	LIZ TURNER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>I am writing to express my objection to proposals contained in the Dacorum Borough Council Emerging Strategy of Growth, in particular the proposed development in the countryside and the impact this will have on the community and of course the Environment!</p> <p>I am extremely concerned about</p> <ul style="list-style-type: none"> • Impact on the loss of green belt land, the Chilterns area of OUTSTANDING natural beauty and the Chilterns Beachwoods special area of conservation • Over provisions of housing • Failure to address climate emergency issues! • Impact on infrastructure and local community • Water issues • The lack of brown field regeneration proposals • Over resilience 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	Environment and Biodiversity
ID	EGS8537
Person ID	1266479

Full Name	DAVID BARTHOLOMEW
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I am emailing you to express my objection to the proposed development outlined in Dacorum Borough Council's document entitled "Emerging Strategy for Growth (2020 – 2038)". As a resident, I implore DBC to reconsider this plan which imposes massive over development on an already stressed environment, with severe implications for the integrity of the Green Belt and our status as an AONB (in fact the 2019 Glover report recommended that the Chilterns should be given National Park Status). Our countryside is precious and finite and it is therefore critical that land is not lost to development unnecessarily.
Included files	
Title	Environment and Biodiversity
ID	EGS8548
Person ID	211354
Full Name	Mrs Laura Sanderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The lack of water supply without further illegal abstraction from our unique chalk streams renders all DBC's policy statements about the environment and biodiversity meaningless and vacuous.
Included files	
Title	Environment and Biodiversity

ID	EGS8671
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p><u>Ecology.</u> Detailed comments that relate to potential ecological impacts, regarding the growth areas, are outlined in section 11 and Appendix It should be noted however, that many of the comments relate to their proximity to Local Wildlife Sites (LWS). There are in the region of 35,000 LWSs in England and these make a vital contribution to delivering both the UK and Local Biodiversity and Geodiversity Action Plan targets and maintaining local natural character and distinctiveness.</p> <p>They provide important and widely distributed wildlife refuges for vulnerable and less vulnerable fauna and flora and, through their connecting, stepping stone and buffering qualities, support other site networks such as Local Nature Reserves, National Nature Reserves, Sites of Special Scientific Interest, Ramsar sites and the new 'National Site Network' of Special Protection Areas and Special Areas of Conservation. They are likely to form an important part of the Nature Recovery Network and the correspondent Local Nature Recovery Strategies that local authorities will be partners in delivering, a major commitment in the Government's 25-year Environment Plan to be introduced as part of the Environment Bill.</p> <p>Although non statutory, LWSs are a material consideration in the planning process, and can support local biodiversity, habitats, climate change adaptation and health and wellbeing strategies and Unlike Local Nature Reserves, there is no expectation or requirement for LWSs to be publicly accessible, although the biodiversity thresholds for declaring LWSs are typically slightly more stringent.</p> <p>Protection for LWSs comes from planning policy and development management decisions. The NPPF requires local plans to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks (paragraph 174), to cater for the cross-boundary nature of such networks (paragraph 171) and to protect them when determining planning applications (paragraph 175). Nature Recovery Networks differ from Green Infrastructure networks in that their prime purpose is the protection and enhancement of biodiversity, rather than the emphasis being on ecosystem Some sites may be able to meet both criteria.</p> <p>Government guidance on planning and the natural environment states, 'Local Wildlife Sites and Local Geological Sites are areas of substantive nature conservation value and make an important contribution to ecological networks and</p>

nature's ' It also states that national planning policy expects local plans to identify these sites and include policies to secure their protection and enhancement.

LWSs are identified for their importance at county / unitary level, using national guidance published by Defra in 2006 which is further informed by local species information and conservation In Hertfordshire the process is carried out by the Local Wildlife Sites Partnership (which is accountable to the local authorities in the county). Sites brought forward for consideration are assessed by expert ecologists from HMWT and the HERC, and candidates for listing are subject to final approval by the Ratification Panel (which includes Natural England and Herts Ecology). Local Authorities can ask for LWSs to be resurveyed or deselected, usually if there is concern that a significant part of a site has been damaged or degraded. Before deselection, consideration must be given to the potential for repair or restoration of the feature(s) of special interest for which the site was designated.

There is no statutory requirement for the owners of land on which LWSs are identified to be pro-actively notified. This is in part due to a concern that this would lead to the deliberate neglect of sites to enable de-listing and remove development protection. This is something of a gordian knot; if a landowner does not know that their land includes a site of wildlife value it is more difficult for them to manage it or to seek advice.

It should be noted that there is no statutory requirement for landowners to maintain the sites, neither is there hypothecated funding, although grants for other habitat / biodiversity purposes can be used and it seems likely that some funds may be made available through Local Nature Recovery Plans. We also see a positive relationship with Biodiversity Net Gain proposals, which we anticipate being enacted in the Autumn of 2021. Owners of LWSs would be free to propose their sites as recipient sites for biodiversity offsets from development sites which cannot produce the necessary Net Gain, which would attract funding in return for Conservation Covenants both setting out protective and management arrangements for the LWS.

The emphasis of nature conservation is shifting from protecting wildlife solely within designated sites to establishing a network of core areas of habitat that are robustly linked together through habitat corridors. The management of existing sites together with the designation of new sites will help reduce the pressure caused on by development growth on sites of biodiversity importance that are sensitive to human

To assist with the provision of a Nature Recovery Network and in line with the NPPF, the application of local plan policies will enable the creation of a coherent local ecological This will be delivered through the designation of Local Wildlife Sites and Local Nature Reserves alongside partners including developers, landowners, amenity groups and county-level partnerships. Land safeguarded by Conservation Covenants to deliver biodiversity net gain will also form an important part of the local ecological network.

The county council is keen to see efficient use made of land, and to enable people to enjoy the natural environment for health, leisure and recreational Ecosystem services and green infrastructure such as SUDs, Public Rights of Way and renewable energy generation can also co-exist positively with biodiversity. In principle measures to combine biodiversity protection and enhancement with other sustainable land use purposes will be supported, however it will be necessary to show how the biodiversity features being protected will thrive alongside other proposed uses.

Whilst section 11 of this representation contains specific comments against the relevant ecological policies that are contained within the draft plan, the LPA should consider including the following policies:

Ecological Networks (Strategic Policy)

Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the borough's ecological networks by:

- 1 being of an appropriate size, scale and type in relation to their location within and impact on the ecological network;
- 2 maintaining, strengthening and bridging gaps in existing habitat networks;
- 3 planting native species and creating new, or restoring existing, national and local priority habitats and/or species; and working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate

Local Wildlife and Geological Sites (Strategic Policy)

Local Wildlife and Geological Sites will be identified and designated by the Council in partnership with the Hertfordshire Local Wildlife Site Partnership and are shown on the Policies Map. Other sites, including those awaiting designation, which can be demonstrated to meet the selection guidelines for Local Sites will be afforded the same level of protection.

Valuing Biodiversity (strategic) policy

XXX of the borough council's area has a range of internationally, nationally, and locally important habitats, sites and species that will be protected through the following principles:

Proposals which may harm designated Local Wildlife Sites, Local Geological Sites, Priority Habitats, Priority Species, protected species or non-designated sites or features of biodiversity interest, will only be supported where:

- 1 the mitigation hierarchy is applied so that firstly harm is avoided wherever possible, then appropriate mitigation is provided to lessen the impact of any unavoidable harm, and as a last resort compensation is delivered to offset any residual damage to biodiversity;
- 2 they use the DEFRA biodiversity metric to demonstrate that a proposal will deliver a minimum 10% net gain for biodiversity;
- 3 they protect, restore, enhance and provide appropriate buffers around wildlife and geological features and aim to link these to the wider ecological network;
- 4 they produce and deliver appropriate long-term management plans for local wildlife and geological sites as well as newly created or restored habitats;
- 5 they can demonstrate that the need for a proposal outweighs the value of any features to be lost; and
- 6 if the permanent loss of a geological site is unavoidable, then provision will be made for the site to first be recorded by a suitably qualified

Proposals which may impact proposed or designated Special Areas of Conservation, Special Protection Areas or Ramsar Sites will only be supported where it can be demonstrated 'beyond reasonable scientific doubt' that there will be no adverse effects on the integrity alone or in combination with other plans or projects, unless there are no alternative solutions, that "imperative reasons of overriding public interest" (IROPI) apply and that compensation is

Proposals that may either directly or indirectly negatively impact Sites of Special Scientific Interest will not normally be supported. Proposals should seek to protect and enhance Sites of Special Scientific interest wherever possible.

SECTION 18: ENVIRONMENT AND BIODIVERSITY

Ecology. As currently worded, this chapter draws on recent, contemporary and emerging policy and legislation to highlight the importance of a healthy and diverse environment to the economic health and wellbeing of the borough and its people. In particular, it makes welcome reference to the main messages of the previous Natural Environment White Paper with its aims to halt the loss of biodiversity by 2020 and the establishment of 'healthy functioning ecosystems' and the establishment of 'coherent ecological'

Furthermore, it draws on the current 25 Year Environment Plan, the emerging Environment Bill and the NPPF by referencing the requirement to embrace Biodiversity Net Gain amongst other duties faced by local authorities such as those to safeguard priority habitats and species as laid out in the NERC Act It also draws on more local evidence such as the Hertfordshire Biodiversity Action Plan (2011) and Green Infrastructure Plan (2011).

The county council welcomes this overall However, national biodiversity policy and law is developing rapidly, and the Environment Bill is expected to be given Royal Assent in Autumn 2021. The plan's vision and this chapter should be reviewed in the light of the contents of the current wording of the Bill and the final Act. The language of the draft Bill is stronger in its protective intent than that found in this draft of the Local Plan. In particular, there is no overt reference to the borough's need to safeguard biodiversity resources. It is advised that this should be addressed in the commentary within this section. The forthcoming requirements for local nature recovery networks as set out in the Environment Bill should also be referenced. Locally designated sites (Local Wildlife Sites and Local Nature Reserves) will be key to delivering these networks.

The hierarchies shown in the section are of interest, but the key hierarchy relating to spatial planning and biodiversity, the Mitigation Hierarchy, is not given precedence in the commentary and is somewhat erroneously represented in paragraph 26. The mitigation hierarchy is set out in Government Guidance on the Natural Environment – Biodiversity, geodiversity and ecosystems, and also in guidance on Biodiversity Net Gain. It sets out the following steps:

- Avoid: locate development on sites that do not have significant biodiversity value;
- Mitigate: through design or effective on-site mitigation that can be secured by conditions or planning obligations;
- Compensate: as a last resort where it can be demonstrated that the development is of overriding importance and none of the above steps are possible.

The guidance further states that where a development cannot satisfy the requirements of the mitigation hierarchy, planning permission should be refused as indicated in paragraph 175 of the NPPF. The hierarchy and this direction should be included in the commentary of the plan, and indeed should demonstrably guide site allocation in the plan as a whole

Policy DM28: Protection of Sites

Ecology. The same government guidance refers specifically to LWS and notes their “substantive nature conservation value”. It further states: “National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.”

As the draft local plan stands, there is no mention of LWSs and their importance, and no map is provided. There are 237 such sites in the Borough, part of a network of 1800 sites in the County. This policy gives weaker protection than that attributed to them through the Mitigation Hierarchy and national policy. It also appears to invert the hierarchy in places. Policy DM28 needs to be revised in accordance with the mitigation hierarchy in national planning policy. In addition, the tests for development proposals on sites of international importance are incorrect and should be restated as per legislation.

It is recommended that a new policy addressing the need to support and augment the network of LWSs and Local Nature Reserves as part of the development of a Local Nature Recovery Network should also be included (this forms a key part of the Environment Bill and is expected to be a duty imposed by the Environment Bill when it receives Royal Assent).

Where relevant, the means by which LWS habitats are maintained should also be recognised. For instance, many are sustained by agricultural practices that are inextricably linked to the need for economically viable farming businesses. Herts Ecology would be happy to advise and support on the wording of this

The presentation of priority habitats and species as the lowest level of 8 is unhelpful, as this suggests little importance is attached to them, and omits the fact that there is more local control over the designation and protection of this type of site than any of the other types. There are also more of these sites than there are of those in the larger pyramid segments, so this is graphically incorrect.

Sustainability. Paragraph 1 within Policy DM28 should be more specific with regard to the protection, maintenance and enhancement of nature conservation sites, habitats and sites of geological and geomorphological interest (e.g. planting x species, increasing grasslands by x% depending on current baseline).

Policy DM29: Protected Species and Priority Species and Habitats Policy

Ecology. The addressing of the need to protect species and habitats as well as sites is welcome, but it is not as strong as would be expected. The tests suggested in the policy do not include the need for the planning system to satisfy the parallel licensing process for European protected and other

Paragraph 18.27

Ecology. The draft local plan rightly draws attention to the emerging legal requirement for development to deliver a measurable net Paragraph 18.27 which promises to introduce a monitoring framework is especially welcomed.

Policy DM30: Biodiversity Net Gain

Ecology. The explanation of biodiversity net gain is confused and, in some aspects, incorrect. The fundamental elements are the use of the Mitigation Hierarchy in selecting sites, in using the biodiversity metric to calculate the net gain required, and then the integration with any off-site provision of biodiversity net gain with the requirements of the plan for the local Nature Recovery Network.

The “Biodiversity Net Gain Principles” set out by government state: “Do everything possible to first avoid and then minimise impacts on biodiversity.” This principle is not carried through into Policy DM30 or its explanatory text where the tests are seen as simply sequential. In proposals which will have a negative effect on existing valued biodiversity sites, species or habitats, the onus is on the developer to demonstrate how this principle has been met, i.e. why only this site is suitable and why a different location has not been chosen.

If this criterion is validated i.e. there is no other suitable location, or the chosen location is that which causes least biodiversity harm, then the next step in the hierarchy is enacted.

- The specific and useful reference to the current ‘Natural England Biodiversity Metric 2.0 Calculator’ is welcomed, however, the metric is likely to evolve through several iterations over the lifetime of the Plan and so it would be beneficial if Policy DM30 was amended to accommodate future

Another fundamental component of Net Gain is the establishment of an ecological network of the NRN. This appears to be omitted completely yet is expected to be a duty imposed by the Environment Bill when it receives Royal Assent earlier comments under Policy DM28. The Network needs to enable habitat linkages to adjoining boroughs. The county council will be leading on a countywide approach to biodiversity net gain, and we will provide further detail as work on the draft legislation is shared in the public domain.

Policy DM31: Chilterns Beechwoods Special Area of Conservation

Ecology. Comments regarding the Habitats Regulations Assessment/Impact on the Chilterns Beechwoods SAC not only applies to this policy, but also to policy DM32 and potentially to the growth areas and allocated sites across the (see also earlier comments on Policy DM28 regarding the protection of such ‘international sites’).

It does not appear that the local plan has been informed by a Habitats Regulations Assessment (HRA). Reference in the local plan to the 2020 HRA ‘Screening report’ is potentially misleading as that has been found to contain important shortcomings. Whilst an HRA is only required by law for the final document, it is good practice for one to accompany and influence each stage of the plan making process.

Given its statutory duty in the review of HRA, Natural England’s opinion should be sought on this matter, but the following is offered as advice to help the Borough deliver its duties as a ‘*competent authority*.’ The absence of a formal and complete HRA comprising both ‘*screening*’ and ‘*appropriate assessments*’ is manifest that the potential for harm arising from an increase in recreational pressure on the Chilterns Beechwoods Special Area of Conservation (SAC) does not appear to inform the parameters of any residential allocations in the draft local The LPA has a legal duty under Regulation 105 to adopt a plan (or grant planning permission) ‘*only after having ascertained that it will not affect the integrity*’ of the SAC (and not, as suggested by the current Policy DM28, following use of the derogations).

Although a visitor survey is underway, its results will not be known for a considerable time. However, findings from exercises on similar sites in the region suggest that a catchment area extending several kilometres from the site boundary could be found. Given that Ashridge represents a highly popular destination of choice, a large catchment is likely to become apparent.

Typically, local plans seek to mitigate such effects by the establishment of alternative natural greenspaces, often linked to and required as part of particular allocations, to deflect users elsewhere, often combined with site-based measures to reduce the impact within the SAC. A strong degree of confidence (*'beyond reasonable scientific doubt'*) is required as to the effectiveness of such measures before they can be employed to avoid an adverse effect (and is defined in case law *g. Waddenzee, the Dutch case and Grace & Sweetman*).

The draft local plan seeks to anticipate these requirements in Policies DM31 & 32 but is second-guessing the outcome of an HRA. We are concerned that there is potential for adoption of a hierarchy of measures in an incorrect order. What is possible and what is not, is tightly defined by policy and case law and, as currently worded, the potential for conflicts is considerable; the encouragement of site management within the SAC could conflict with other case law (*g. Briels and Orleans*). Also absent is any indication of these issues in the individual residential allocations.

In addition, nitrogen deposition from increased road traffic associated with a growing population is also likely to threaten the integrity of the SAC. This too can have a powerful influence on the suitability of residential allocations across a considerable area. We are aware that a traffic and air pollution study is underway and that this will inform the HRA of the draft local plan, but it must be recognised this may influence the scale and distribution of those currently

Policy DM33: Protection and Enhancement of the River Character and Water Environment

Lead Local Flood Authority. The county council supports proposals to de-culvert watercourses and restore watercourses to a more natural state, as stated in paragraph

With regard to paragraphs 4 and 5, there is potential for confusion with the associated footnotes. There is reference to the Water Framework Directive (WFD) and within this legislation, waterbody includes The footnote explaining waterbody refers to rivers, but not watercourses which can be as significant. It is questioned whether the 10m buffer is practicable for the canal side developments and small ponds.

Paragraph 18.46

Lead Local Flood Authority. It is considered that the wording within this is contrary to paragraph 4b in Policy SP10: Climate Change Mitigation and

Table 24 SuDS Hierarchy

Lead Local Flood Authority. Currently, living roofs and walls that are listed within this table, are not accounted for in surface water drainage. However, the Non-Statutory National Standards are currently being reviewed and revised, in order to accommodate water conservation measures such as green and blue roofs contributing to surface water drainage measures.

Paragraph 18.56

Waste Management Unit. The need to relocate the existing Household Waste Recycling Centre in Hemel Hempstead, as mentioned within this paragraph is The existing facility at Eastman Way is identified in the county council's 'Local Authority Collected Waste Spatial Strategy, Household Waste Recycling Centre Annex (Updated April 2019) as being too small to adequately deal with the high level of demand placed on it. The size of the centre significantly restricts its layout and the ability of vehicles to make use of available car parking spaces. Investigations to expand this centre identified that neighbouring land is contaminated and therefore it is not financially viable to expand this centre.

The relocation of this facility to the North Hemel Growth Area is also supported and further comments are made in relation to this in the North Hemel Hempstead allocations section of the

Policy DM35: Protection from Environmental Pollution

Public Health. Air quality is mentioned within this policy, although it is disappointing that this is not a standalone policy. The detail within this policy is not considered sufficient to guide development and it is recommended that the further guidance (as mentioned in paragraph 2a. iii) which the borough council intends to produce, is potentially adopted as a Supplementary Planning Document (SPD) and includes the following specific areas:

Air pollution causes more harm than passive smoking and is responsible for the early deaths of an estimated 40,000 people in the UK1. Every new development will have an impact on air quality, usually by increasing emissions from buildings or from traffic The links between poor air quality, human health, and the environment are well documented and is classed by Public Health England as a major public health risk alongside cancer, heart disease and obesity.

Long-term exposure to air pollution is linked to reduced life expectancy, increased cardiovascular disease, poor lung function and mental health Short-term exposure (over hours or days) to elevated levels of air pollution can also cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality. The impacts of air pollution on our health can be felt throughout our lifetime.

Air pollution can affect anyone's health; nevertheless, some individuals can be more susceptible than These include:

- Children;
- the elderly;
- individuals with existing cardiovascular or respiratory diseases;
- pregnant women;
- communities in areas of higher pollution, such as close to busy roads;
- low-income communities

The last two points are particularly relevant to urban areas and have strong links to health Any policy guidance should be expecting development to achieve overall improvements to air quality and minimise the potential adverse impacts, with the objective to reduce community exposure. Development could be encouraged to adopt Public Health England's 2019 'net health gain' principles, in order to improve outdoor air quality and public health. These principles should be incorporated in design to reduce emissions and contribute to better air quality management that are applicable irrespective of air quality assessments.

Transport. The word 'drivers' should be replaced with 'highway users' as follows:

A. *Avoid dazzle and disturbance to ~~drivers~~ highway users:*

Policy DM37: Landscaping on Development Sites

Sustainability. It should be ensured that any flora/vegetation that is planted is resilient to climate change. The Royal Horticultural Society (RHS) produced a report in 2017, titled: 'Gardening in a Future Climate' which addresses garden management and design within a changing.

Included files

Title Environment and Biodiversity

ID EGS8798

Person ID 1261814

Full Name Liz Uttley

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment DM33 and DM35 – these are positive policies but it is hard to see how they can be achieved with such an accelerated building drive.

DM36 it is positive that tree planting is being encouraged but there needs to be a plan for maintaining the trees, to ensure carbon sequestration from those trees over time, perhaps by using a third party to plant and manage the trees to ensure maximum CO2 capture, and certifying this against an independent scheme (such as the Woodland Code).

Included files

Title Environment and Biodiversity

ID EGS8813

Person ID 1158356

Full Name Colin Blundel

Organisation Details Planning Officer

Chiltern Society

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Policy DM27 - Landscape Character and Chilterns Area of Outstanding Natural Beauty - The Society fully supports this policy. The supporting text should refer to the Chilterns potentially being designated as a National Park during the plan period.</p> <p>Policy DM28 - Protection of Sites - The Society supports this policy.</p> <p>Policy DM29 - Protected Species and Priority Species and Habitats Policy - The Society supports this policy.</p> <p>Policy DM30 - Biodiversity Net Gain - We support this policy, but there needs to be a clear targeting strategy to ensure it creates the right habitats in the right places and establishes wildlife corridors and networks between sites.</p> <p>Policy DM31 – Chilterns Beechwoods Special Area of Conservation - The Society supports this policy. The Chilterns Beechwoods Special Area of Conservation (CBSAC) is a site of European importance for biodiversity and wildlife conservation. Again, the Plan is premature and unsound in that Dacorum has not fully considered the adverse effects on the CBSAC. Dacorum is being irresponsible for publishing the Local Plan without this assessment.</p> <p>Policy DM32 - Development on the Ashridge Estate - The Society supports this policy.</p> <p>Policy DM33 - Protection and Enhancement of the River Character and Water Environment - The Society welcomes the recognition of the importance of the chalk streams. The policy could go further in seeking to restore flows and improve the water quality and ecological conditions along these watercourses. Many of the sites proposed for allocation in the Plan, particularly around Hemel Hempstead and Berkhamsted, are likely to put unacceptable increased pressure on water resources in particular and contradict the aims of this policy. Water supply is a problem across the Borough, and abstraction from the chalk streams is supposed to be being curtailed, where would this extra supply come from? New water supplies and massive investment in infrastructure is required for the whole area which cannot be provided by Dacorum and relies on other bodies. There is no indication as to if and when this will be carried out and therefore the Plan is premature.</p> <p>Policy DM36 - Tree Retention and Protection - The Society supports this policy.</p> <p>Policy DM37 - Landscaping on Development Sites - The Society supports this policy. However, the policy and supporting text should recognise the threat of ash dieback and seek to encourage replacement planting of other species suitable to the locality. This needs robust planting and enforcement of it and the species must be appropriate. However, tree planting alone is not enough - detailed landscaping schemes with structural planting on development sites must be provided.</p>

Policy DM38 - Open Land - The Society supports this policy.

Included files

Title Environment and Biodiversity

ID EGS8852

Person ID 1266797

Full Name Lesley Wood

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

On a personal note I think that, in this era when we are trying to build a greener more sustainable world, your plans to build over so much greenbelt land in my hometown are not just ill informed, ill thought out and positively anti democratic, they are a developers' dream that is totally out of step with what local people who actually live in these towns want.

Included files

Title Environment and Biodiversity

ID EGS8854

Person ID 1266799

Full Name Karen Kelly

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment	<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>
Included files	
Title	Environment and Biodiversity
ID	EGS8859
Person ID	1266801
Full Name	Jane Oliver
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<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.</p> <p>Too many houses are planned.</p> <p>Dreadful destruction of Green Belt</p>

Threat of overwhelming the local resources and facilities.
Rethink this plan with consideration of the above concerns and the views of the residents and voters.

Included files

Title Environment and Biodiversity

ID EGS8873

Person ID 1266814

Full Name Eric Juster

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

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.

Included files

Title	Environment and Biodiversity
ID	EGS8942
Person ID	1266875
Full Name	PERKS EMILY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I would like to express concerns about an increase in air pollution for those people currently living in the town. The nature of the Valley that Berkhamsted and Northchurch lies in means that there is a possibility of an increase in air pollution “settling” in the valley. I would like to see a long term study over several years by the environmental agency to confirm whether levels of air pollution from cars and woodburning appliances is greater in the valley than the national average.
Included files	
Title	Environment and Biodiversity
ID	EGS8957
Person ID	222676
Full Name	Mrs Carolyn Hill
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Section 18 - I am also writing to say I have serious objections, as all of those presented by BRAG as this is an area (BK01) of special biodiversity which must be protected. There are breeding skylarks and yellowhammers in the arable

fields,, pasture and hedge margins and this are very healthy populations in this area which need protecting as threatened farm land birds. In particular, yellowhammers are on the BoCC 4 red list (Birds of Conservation Concern).
The land between Hall Park and the A41 is in the Green Belt for a reason - to provide a natural buffer, sound insulation and wildlife corridor - and the underpasses built into the A41 provide this.

Included files	
Title	Environment and Biodiversity
ID	EGS8970
Person ID	1266893
Full Name	PENNY HARRISON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> • 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 there is 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.
Included files	
Title	Environment and Biodiversity
ID	EGS9028
Person ID	1267011
Full Name	Mr Louis Quail

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Bio Diversity and the Natural World</p> <p>What happens to the chalk streams River Bourne etc and bio diversity when the extra pressure either dries out the aquifer or forces the water companies to push its sewage into the streams in the increasingly regular emergencies as happens now . Surely there is a danger the council will breach its legal duty to protect the wild life in these streams with the extensive housing planned for the area.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS9029
Person ID	1267011
Full Name	Mr Louis Quail
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Air Pollution</p> <p>Has the council considered the risks to pollution and the extra pressure on the roads to the citizens like me who live on the high street in Northchurch . We have been told are already close to legal levels of pollution . who is responsible of</p>

pollution levels go over legal limits. Or do we not have to worry about this and the extra fatalities that are associated with pollution now we have left Europe.

Included files

Title Environment and Biodiversity

ID EGS9044

Person ID 1267059

Full Name Fiona Fulford

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

- Much of this green belt land borders the Area of Outstanding Natural Beauty and the Chiltern Beeches Special Area of Conservation. Both are likely to be significantly damaged by the dramatically increased local population from these over-developments using them for leisure and commuting as well as the inevitable strain on water resources no doubt resulting from additional water being drained from the chalk aquifer. I understand that destroying green belt land so near to such areas is also not legally justified under the 'special circumstances' for green belt development.

Included files

Title Environment and Biodiversity

ID EGS9048

Person ID 399841

Full Name Mrs Gillian Lumb

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ol style="list-style-type: none"> 1 WATER SUPPLIES. We are told that the water supply is insufficient to support numerous new builds in the Northern Home Counties:- <ul style="list-style-type: none"> • A study looking for new water sources has found no new sources before the 2030's. • The water companies in the past have seriously affected the flows of the chalk streams in this area by over extraction leading to the Bulbourne running dry through Berkhamsted. • The aquifer which supplies London and our area is being depleted faster than it is being replenished. Building over green spaces prevents water sinking into the soil causing run off and eventual loss of fresh water to rivers and thence to the ocean. • Sewage facilities at present are at the bottom end of satisfactory. Waste water from some businesses is allowed to overflow into the River Gade causing damage to the stream life by pollution. 2 AIR POLLUTION. The population increase will cause unacceptable congestion of traffic in the town centres because the new housing will not be within walking distance. Although the situation with regard to schools can be rectified by building more and the same with health centres, it is not possible to stop new residents from using their vehicles to drive about the town centres causing more congestion and more air pollution. The air pollution is already at unacceptable levels in the centre of Berkhamsted and probably elsewhere in the borough, though I do not have any figures for this. 3 The Chilterns beechwoods are noted as having significant biodiversity. More building in the Dacorum borough will most probably impact on this diversity due to increased air pollution and people pressure on local beauty spots.
Included files	
Title	Environment and Biodiversity
ID	EGS9061
Person ID	1267065
Full Name	M BALAC
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	I am writing to object to the New Dacorum Local Plan. 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.
Included files	
Title	Environment and Biodiversity
ID	EGS9097
Person ID	1267075
Full Name	MICHAEL JAMES
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	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 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 therefore critical that land is not lost to unnecessary development.
Included files	
Title	Environment and Biodiversity
ID	EGS9111
Person ID	1174481
Full Name	Mr & Mrs Ostle
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Biodiversity; Whereas a nod to the Policy is fairly clear, the plan lacks specificity as how developers would legally be held to uphold what they have been committed too. It is strongly our view that the biodiversity and other environmental issues must be enshrined with legally binding commitments and unconditional guarantees to ensure that that all aspects are fully complied with. This must be a pre-condition to commencement of any development work, as too often Developers often in post contract agreement with Local Authorities, walk away without completing their housing type and Environmental conditions.
Included files	
Title	Environment and Biodiversity
ID	EGS9156
Person ID	211352
Full Name	Mr Andrew Sanderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The lack of water supply without further illegal abstraction from our unique chalk streams renders all DBC's policy statements about the environment and biodiversity meaningless and vacuous.
Included files	
Title	Environment and Biodiversity
ID	EGS9208
Person ID	1267203
Full Name	Ms Eileen Martin
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The pandemic shows how much our contact with the natural environment contributes to our health and well being. The Plan proposes to damage our Areas of Outstanding Natural Beauty and other natural assets and create more of a concrete jungle. There is likely to be an increase in Mental Health issues if restorative, life sustaining features are not considered.
Included files	
Title	Environment and Biodiversity
ID	EGS9308
Person ID	1267332
Full Name	Nandi Jordan
Organisation Details	Chair Berkhamsted and Tring Labour Party
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats. Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below (IMAGE ATTACHED TO COMMENT) from European Environment Agency. https://www.eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure

The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.

The plan should also guarantee the following:

- Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices.
- Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted.
- All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator.
- Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.
- Control of polluted waters discharge to non-mains drainage prohibited.
- Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights.
- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.
- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files	ATTACHMENT TO COMMENT EGS9308.jpg
Title	Environment and Biodiversity
ID	EGS9336
Person ID	1267356
Full Name	Andrew Johnson
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	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.
Included files	
Title	Environment and Biodiversity
ID	EGS9427
Person ID	1267395
Full Name	SIMON WEBB
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	A minimum 50% increase in biodiversity required for each development. Bio diversity is VERY low on agricultural land so the 10% uplift is too low
Included files	
Title	Environment and Biodiversity
ID	EGS9506
Person ID	399324
Full Name	Ms Julie Hollway
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>DM27 (“Landscape Character and Chilterns Area of Outstanding Natural Beauty”) has inconsistencies with the proposed Green Belt boundary alterations. The policy states major development affecting the setting of the AONB will only be granted if such development will conserve and enhance the Chilterns AONB’s special qualities, distinctive character, tranquillity and remoteness, and will not “negatively impact on the skyline views of the scarp slope”. Clearly, development on the proposed BK06 (“Wishing Tree Field”) site will affect the AONB (as views from the AONB, eg Northchurch common, MUST be taken into account) and will <u>not</u> conserve or enhance its special qualities etc. That would have a hugely negative impact on skyline views of the scarp slope from Bell Lane, Shootersway and Darrs Lane.</p> <p>Issues are similar re DM35 (“Protection from Environmental Pollution”), i.e. aspects are inconsistent with the proposed Green Belt boundary alterations. It is stated that development proposals “resulting in the need for exterior lighting will only be supported if there would be no significant (or material) adverse impact upon important features of the urban and rural environment including ... the visual character of the natural and historic environment”. Clearly, development on site BK06 (“Wishing Tree Field”) will be visible from and affect AONB land and result in new light pollution.</p> <p>DM36 (“Tree Retention and Protection”) states “Developers will be expected to protect and retain existing trees and hedgerows as part of development proposals, and to replace them where their loss is justified.” but is contradictory. When is loss “justified”. Para 174 of the NPPF requires DBC to “promote the conservation, restoration and enhancement of priority habitats” plus para 175(c) that “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons”. “Priority habitats” includes all habitats designated as being of “principal importance” under s 41 of the Natural Environment and Rural Communities Act 2006, and therefore includes hedgerows. “Irreplaceable habitats” include habitats which would “take a very significant time” “to restore, create or replace once destroyed”. Such habitats include “veteran trees”, but also other trees that would not generally be considered veteran but which nonetheless are of sufficient age to represent a valuable asset that would take many decades to replace.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS9544
Person ID	1267432
Full Name	David Fox

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<ul style="list-style-type: none"> Much of this green belt land borders the Area of Outstanding Natural Beauty and the Chiltern Beeches Special Area of Conservation. Both are likely to be significantly damaged by the dramatically increased local population from these over-developments using them for leisure and commuting as well as the inevitable strain on water resources no doubt resulting from additional water being drained from the chalk aquifer. I understand that destroying green belt land so near to such areas is also not legally justified under the 'special circumstances' for green belt development.
Included files	
Title	Environment and Biodiversity
ID	EGS9561
Person ID	1264246
Full Name	Steve Burdekin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Air pollution is killing more people in the UK than cigarettes and alcohol abuse. Many of our towns have staggeringly high levels of harmful particles especially at peak times.</p> <p>We should be using the most up to date figures regarding air quality in Dacorum, they're currently not accurate or relevant</p>
Included files	
Title	Environment and Biodiversity

ID	EGS9583
Person ID	1267450
Full Name	Mrs Ruth Taljaard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<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"> You MUST also develop NEW ROAD. This pathway is already NOT SAFE. My children have to walk along it to go to their school (St Marys CofE) and I often get hit by van side mirrors as they pass. Imagine if that was a child!!!! The pathway needs to be widened, even at the cost of vehicles. Our children's safety is paramount! You MUST develop the bridge on New Road. It is a single track bridge over the canal. Yes it is beautiful to look at. But it is not SAFE, especially for our children. There is no safe way to cross the road from the path to the canal path. This bridge must be developed into something that is safe for our children to walk across and over. Especially as there is a school next to it. The canal path must be upgraded. It gets so muddy in the winter. It must be pathed or concreted in order to sustain the proposed increased foot-fall. I don't think that one road access to a residential area is wise. I think two ways in and out is safer. Cars already SPEED down New Road and the High Street - especially near the school and the Northchurch playing fields. What do you propose to do to keep cars and all this new traffic obeying the speed limit and keeping our children safe? Especially with the proposed new amount of vehicles to be using it. You MUST develop at least a footbridge (with cycle path) over the canal and river, across from Lock Field over to the Northchurch playing fields/Tesco. This will keep any children who then live in Lock Field safe, away from the roads, so they can visit the park/shops without having to use the VERY DANGEROUS New Road and High Street pathways. If children live on Lock Field - you must also develop the footpaths on the High Street as well. Children will want to access Tesco and the Northchurch Playing fields. People park cars on pathways, which are already un-safe,

small as it is. There have been times I've had to push my babies in a pram IN THE ROAD due to cars being parked on the pavement! You MUST double-yellow-line all along those pathways!

- You are developing a 'green-belt' area. Firstly, by doing this you are making your 'rules' void. How do you expect anyone in Dacorum to respect you, believe what you say or take you seriously if you develop on a 'green-belt' area? Secondly, how do you plan to keep it 'green'? Are you asking the construction company to include minimum of 2 trees and 3 shrubs per home?
- Instead of building 60 tiny homes that are ugly and bad for the environment. What about building 40 homes that have larger gardens, more trees and shrubs and keep the area vaguely 'green'?
- Will the new houses be 'green' in the sense of - they will all have solar panels and other sources of renewable energy? It is a green-belt area.
- I'm no wild-life expert...but this is not an urban area (such as an old factory in a city being replaced with residential) - this is countryside. Many animals will live there. I myself have seen king fishers, ducks, herons, foxes, badgers, and much more wildlife along that stretch of the canal. You are killing their homes. Not only in the long run, but in the short term - while all the horrible machines are there digging and making noise. What are you doing to protect the wildlife that lives here? Are you planning on keeping a minimum 10 meter wildlife 'belt' between the canal and any potential housing? If this 'belt' is grass - will you plant more trees and shrubs to encourage wildlife to return after the bombardment of a building sight?
- You must add a footpath from Lock Field into Ashridge. So people can walk directly from Lock Field into Ashridge without having to use the foot path on New Road - again, this is too thin and not safe compared with the speed of traffic.
- Everywhere in Berkhamsted and Northchurch there are parking issues. Please can you design the new residential area to cope with the amount of vehicles. For example, plan houses to have ample driveways and garages for residents and guests. And double yellow the surrounding roads to STOP people from parking on footpaths. This is not safe for children. Again, if making safe footpaths means building 40 houses rather than 60 - then do it. Make this estate so that bin lorries and fire engines can EASILY drive everywhere (whilst keeping their bin collectors safe!)
- What about social responsibility? Is this new estate designed for middle and upper-class people? Or is it for everyone? Even working class? Are you mixing social housing between the large detached houses?
- How are you planning to future-proof this estate? Are you planning footpaths to be wide enough for two wheel chairs to pass each other safely? This would also be a safer width of path in case there is another pandemic and people have to keep 2 meters away from each other. Are you adding cycle paths? I think if you are serious about the environment then you should include cycle paths EVERYWHERE - even on New Road and the High Street. Even if cycling does not prove to be popular - you are future-proofing this space for things such as hovercrafts or the food-delivery-robots that you see even today in Milton Keynes. Everywhere footpath in Berkhamsted FAILS for safety. Lets make this new estate safe.
- Repair local roads after development. As seen on the new estates up Durrants Lane - the amount of construction traffic (and its pollution) has ruined the roads. Will you repair and redevelop the roads after this estate has been built?

- All of these new houses (both in Berkhamsted, Northchurch, Tring etc) will create a LOT more traffic on the road. How do you plan to future develop the T-junction next to St Marys School between New Road and the High Street? There is no safe crossing for children over New Road AT ALL! And it is next to a school!!!
- You MUST develop the infrastructure. How will you develop the Tesco shop parade and parking to deal with greater numbers? How will you develop local doctors and dentists to deal with greater numbers? Which hospitals are due to take on these greater numbers of people and how are you contributing to their development too?

To summarize; I know that growth is inevitable. But you MUST do it WELL and RESPONSIBLY, for the future of our area, our children and our wildlife.

I'm more than happy to talk to someone or detail my thoughts further. I'm happy to provide photographs of cars parked on pathways everywhere, videos of cars nearly hitting myself and my children walking to school etc etc.

If you build this Lock Field estate then do it WELL. Be innovators, be planet-protectors, be an inspiration to other areas who seek to grow too.

Included files

Title Environment and Biodiversity

ID EGS9678

Person ID 1267468

Full Name Chris Berry

Organisation Details CPRE Hertfordshire

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

The introductory paragraphs to **Chapter 18** set out the national policy framework on biodiversity. However, apart from policies on the Chilterns AONB, protected sites and a series of policies related to development, there is no up-to-date strategic framework outlined for conservation and in particular enhancement of the Borough's biodiversity. The two documents referred to as forming the basis for policy are both out-of-date and do not reflect the urgency of the biodiversity crisis, nor the scope for the enlargement of biodiversity assets as reflected in modern conservation action.

Specifically, attention should be paid to three highly significant areas:

- 1 Chilterns Area of Outstanding Natural Beauty (AONB)
- 2 Chalk streams; namely, the Rivers Bulbourne, Gade and Ver

3 Chilterns Beechwoods Special Area of Conservation (SAC)

The one third of the countryside in Dacorum Borough which is within the Chilterns AONB is a designated protected landscape of national importance which the Council has a duty to protect and enhance, both the area and its setting. In 2019 the Glover Report, commissioned by DEFRA recommended that the Chilterns become the next national park. There is no mention of the Glover Report's recommendation in the Emerging Strategy which promotes substantial areas for housing along the AONB boundary which is unacceptable

Despite chalk rivers being a 'priority habitat' under s41 of the Natural Environment and Rural Communities Act 2006, the Strategy is largely silent on the matter of protecting the three designated chalk streams of the Bulbourne, Gade and Ver. Most of Dacorum lies within the catchments of these three rivers.

Dacorum BC 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 which is a popular leisure and recreation destination. The Council is in the process of engaging consultants to carry out a screening exercise which defines the impacts of development on the SAC and it is irresponsible to publish the Strategy in advance of the results of this study.

Included files

Title Environment and Biodiversity

ID EGS9700

Person ID 1267476

Full Name Sylvia Davidson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

I wish to add my comments concerning the proposals in the planning agenda for Dacorum as set out in the consultation document; the housing numbers proposed are totally unsustainable and do little to serve local needs.; the use of Green Belt land goes against so many other initiatives both locally and nationally to address climate change, protect wildlife, enhance local green and open spaces for recreation, development of new nature reserves and wildlife corridors.

such housing numbers will inevitably cause urban coalescence in this narrow valley e.g. the joining up of Hemel Hempstead. Northchurch Bourne End. How long before there will be no open space between Kings Langley and Tring?

the water supply from ground sources of the precious chalk stream rivers cannot cope with this massive increase in need. As a former member of the Dacorum Environmental Forum and The Chiltern Society Wetlands and Water group I have participated in past Local Plans to point out that Hertfordshire residents have a very high water usage profile, that the eastern region of the UK in some years can be drier than the Sahara, that more abstraction will irrevocably damage the Bulbourne, the Gade and the Ver. It especially will downgrade the wonderful work done on the Bulbourne between Boxmoor and Apsley by the Boxmoor Trust if the river levels are reduced.

Included files

Title Environment and Biodiversity

ID EGS9708

Person ID 1267479

Full Name Roger Harrison

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

- 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 there is 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.

Included files

Title Environment and Biodiversity

ID EGS9772

Person ID 1267525

Full Name Anil Mistry

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Air quality</p> <p>As a town situated in a valley, air pollution is a significant issue which must be taken into consideration in a revised Local Plan.</p> <ul style="list-style-type: none"> • 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. • Berkhamsted lies along a valley, with most residential areas along the bottom and up the sides. Air pollution naturally collects in this area. • The current Local Plan uses 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	Environment and Biodiversity
ID	EGS9785
Person ID	1267530
Full Name	Susan Lambiase
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<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>

- 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	Environment and Biodiversity
ID	EGS9887
Person ID	1267759
Full Name	PETER AND TRACY DUDLEY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>We are writing to object to the plan for development in Dacorum for the following reasons:</p> <p>The number of houses proposed for development per year until 2038 is based on figures produced in 2014, we understand that this proposes a figure of 1,023 houses being built in the area. These figures are now outdated and we're 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.</p>

Secondly, green belt has been defined as land that can only be developed upon in exceptional circumstances. Despite the statement in the plan, the simple need for extra housing cannot be defined as exceptional.

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 Environment and Biodiversity

ID EGS9959

Person ID 1267789

Full Name RICHARD WILNE

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

I write to object to the proposed Dacorum local plan.

The number of houses proposed for Dacorum will alter the character of the area from rural with defined villages and market towns to a suburban sprawl. No explanation has been put forward justifying this detrimental change.

I am in particular shocked at the proposed massive expansion of Tring. We are all accustomed to new building and resigned to new housing estates built in the new placeless vernacular of the large developers, but the scale of the proposed changes is unacceptable.

The great achievement of post war planning is to prevent urban sprawl, using the Green Belt to keep towns distinct and separate. The proposed developments between Berkhamsted and Hemel Hempstead suggest that councillors and officials have failed to comprehend the legacy handed down to them and have no intention of living up to it.

I understand the grounds by which Green Belt land may be released for development and do not consider these to have been met. I do not have confidence in the council's forecasts of housing need or the analysis on which these are based; nor do I have confidence that these are robust as a forward-looking exercise given the as yet unknown effects of the pandemic on patterns of work and family formation, on the apparent migration from London and the resulting changes to the capital, on the future requirements for currently commercial premises in our towns, and on the effects of population size in the wake of Covid and Brexit, with the Economic Statistics Centre of Excellence having recently estimated that 1.3 million foreign-born residents have left the UK.

Given this uncertainty, it seems shortsighted to 'lock in' the destruction through irreversible change of a much cherished area by reliance on estimates that simply cannot bear the weight being placed on them.

I am acutely conscious of the environmental impacts inherent in the proposed plans. In particular, the effect on the chalk streams within the area will be profound. The dry upper reaches of the river Ver upstream from St Albans should be a minatory lesson for all involved in this decision and I urge all officials and councillors involved to walk this route and subsequently justify to themselves and residents why this should be inflicted on the rivers Gade and Bulbourne.

Included files	
Title	Environment and Biodiversity
ID	EGS9966
Person ID	1267791
Full Name	RACHEL DAVIS
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>I'm writing to you in response to the local plan consultation. I have tried to respond through your portal but to no avail.</p> <p>As a resident of Apsley, I have looked at the Hemel Hempstead proposal in the most detail but my general thoughts apply to all of your local plans.</p> <p>Quite simply, I don't think it's appropriate for ANY development to be happening on greenfield sites such as those proposed near the Redborun link road and Leighton Buzzard roads are; nor a crematorium at Bunker's Park - what an absurd proposal! I fully believe that NOTHING should happen on any Boxmoor land or adjacent to. We should be enhancing and celebrating our green spaces, and the history of our area. Hemel has a bad reputation but only because its history has been squashed by poorly thought out housing and land use. There's actually a lot to celebrate and learn about the history of this area - I am sure most people do not know anything because it is not celebrated or even recognised.</p> <p>This leads me onto the brownfield sites that have been proposed. For me, it is only acceptable to develop on these if they will:</p> <ul style="list-style-type: none"> • 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 <p>I spend a lot of time walking around Hemel and looking at land use and I can see that development on some of these brownfield sites could be beneficial to the town if they are managed correctly.</p> <p>I have also heard (on the grapevine) that Dacorum doesn't actually need as many houses as have been proposed but haven't reviewed this. In addition, I notice there is housing for those who have money and those who do not have any. What about the people that have some, but not lots and perhaps are renting or borrowing from the bank of mum and dad? There is NEVER housing for this demographic.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS9993

Person ID	1267853
Full Name	MARINA BURKE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	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.
Included files	
Title	Environment and Biodiversity
ID	EGS10214
Person ID	1268163
Full Name	RONA GIBSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>I am writing to you to make some points regards the Dacorum Local Plan 2020 to 2038</p> <p>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.</p>

1 Some of my concerns

1 a) From 23.120 " There are few opportunities for new road capacity in the town. The careful location of new development and promoting opportunities for sustainable travel, will in part help tackle a number of parking and traffic issues. "

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.

1 b) Please can you detail if there are now any further proposals for waste management ... "The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required." From Draft Infrastructure Delivery Plan Appendix B - Berkhamsted Schedule.

1 c) This is near an Area of Outstanding Beauty and I do wish reassurance or some explanation that this will continue to be so for future generations to enjoy and relax in.

The increase in population could have an enormous effect on the Ashridge Estate.

Included files

Title Environment and Biodiversity

ID EGS10279

Person ID 399324

Full Name Ms Julie Hollway

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>DM27 (“Landscape Character and Chilterns Area of Outstanding Natural Beauty”) has inconsistencies with the proposed Green Belt boundary alterations. The policy states major development affecting the setting of the AONB will only be granted if such development will conserve and enhance the Chilterns AONB’s special qualities, distinctive character, tranquillity and remoteness, and will not “negatively impact on the skyline views of the scarp slope”. Clearly, development on the proposed BK06 (“Wishing Tree Field”) site will affect the AONB (as views from the AONB, eg Northchurch common, MUST be taken into account) and will not conserve or enhance its special qualities etc. That would have a hugely negative impact on skyline views of the scarp slope from Bell Lane, Shootersway and Darrs Lane.</p> <p>Issues are similar re DM35 (“Protection from Environmental Pollution”), i.e. aspects are inconsistent with the proposed Green Belt boundary alterations. It is stated that development proposals “resulting in the need for exterior lighting will only be supported if there would be no significant (or material) adverse impact upon important features of the urban and rural environment including ... the visual character of the natural and historic environment”. Clearly, development on site BK06 (“Wishing Tree Field”) will be visible from and affect AONB land and result in new light pollution.</p> <p>DM36 (“Tree Retention and Protection”) states “Developers will be expected to protect and retain existing trees and hedgerows as part of development proposals, and to replace them where their loss is justified.” but is contradictory. When is loss “justified”. Para 174 of the NPPF requires DBC to “promote the conservation, restoration and enhancement of priority habitats” plus para 175(c) that “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons”. “Priority habitats” includes all habitats designated as being of “principal importance” under s 41 of the Natural Environment and Rural Communities Act 2006, and therefore includes hedgerows. “Irreplaceable habitats” include habitats which would “take a very significant time” “to restore, create or replace once destroyed”. Such habitats include “veteran trees”, but also other trees that would not generally be considered veteran but which nonetheless are of sufficient age to represent a valuable asset that would take many decades to replace.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS10540
Person ID	1268671
Full Name	Mr Mike Jennings
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>FLOODING ISSUES; New Mill area of Tring</p> <p>Please note that the Dacorum Surface Water Management Plan (March 2017) shows areas of concern within the proposed development areas Tr02 and 03. Surface water from the proposed sites contribute to water Hotspot 0, as identified in the Dacorum management plan. The New Mill area already has issues with excess surface water that have yet to be resolved. The recommendations for Tring (Hotspot 0) New Mill area do not address the issues referred to in the following paragraphs.</p> <p>My comments are as follows:</p> <p>The Surface Water Management Plan is already out of date, with climate change accelerating large rainfall events. The Management Plan uses the 1 in a 100 years description for a risk category of rainfall events. This is used because policy makers have yet to agree a useful measure of risk to supersede this category, which is now widely accepted as inaccurate in describing current flood risk levels.</p> <p>Current problems are being experienced with the watercourse / canal feeder from Dundale Wood Local Wildlife Site flowing towards New Road and Icknield Way. In the latter section when water levels are high, as they are now, then the banks leak and water collects onto the adjacent footpath below and has potential to adversely impact the adjacent housing in Chapel Meadow. This has happened previously and sandbags were deployed along the footpath to protect encroachment on the adjacent properties. Further upstream the watercourse flows through Dundale Wood Local Wildlife Site and through front gardens in Morefields. Flows in the watercourse have been high in the autumn and winter months as normal. However the flow varies rapidly in response to operation of sluice gates at the northern end of the lake in Dundale Wood. This wood is managed by Dacorum Borough Council. The footpath around the lake is overtopped when water flows over the sluices, causing erosion around the roots of mature Austrian pines <i>Pinus nigra</i>. All trees within the wood are subject to TPO. The Canal and River Trust, who have responsibility for the water within the this watercourse, open the paddles on the sluice gates causing a surge of water downstream. Pipework and gratings are not adequate for these high flow rates, causing levels to rise in the front gardens in Morefields. A grating on a culvert in Morefields then collects woody and vegetative debris, exacerbating the increase in water levels. This grating is regularly cleared by a local resident (not a sustainable solution). This surge in water causes a backing up in flow as this watercourse and Brook Street stream converge immediately prior to a small bridge under New Road. The water levels regularly overtop the arch under the bridge. High water levels persist as the watercourse flows under the Icknield Way towards the confluence with the Wendover Arm of the Grand Union Canal. Immediately after crossing the Icknield Way the levels of water have been close to overtopping and have the potential to adversely impact the housing in Longbridge Close. The</p>

LIDAR modelling in Dacorum's Management plan appears not to cover a sufficient area to accurately assess the current issues and any future issues arising from proposed development.

If either Tr02 or Tr03, or both, are developed then water run-off must be totally contained within the site(s) to prevent further exacerbation of water issues in the New Mill area.

Included files

Title Environment and Biodiversity

ID EGS10659

Person ID 369415

Full Name Mr Dacorum EnvironmentalForum

Organisation Details Chair
Dacorum Environmental Forum Waste Group

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Environment and Biodiversity comment

- **Comments on chalk streams and water quality**

DEF is particularly concerned that the location of water supplies for new developments has not been specified, and if taken from the local aquifers the unique quality of Chalk Streams will be seriously affected.

This is a summary of DEF's analysis of the issue:

(Quotations in *italics*)

The crucial section of the Plan in the Main Document is the section **Protection and Enhancement of River Character and Water Environment** which starts on page 121.

- ...highlights the **global rarity** of the chalk streams in Dacorum, their relatively poor ecological status and the need to return them to good

- ...identifies that water resources are under **extreme pressure** from the use of groundwater for water supply and from **climate change**. The recharge of groundwater is under pressure and this threatens the retention of fragile ecosystems susceptible to the availability and flow of

...talks about restoring river flows and natural habitats along the chalk

streams, retaining water in the catchment and supporting biodiversity. All of these sections are fine and it then leads to **Policy DM33**.

This policy contains six sub-sections, the most crucial one, in our view, being: “c. **avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments**. The policy opens with the statement “*The water environment will be managed through development management (Surely a tautology?) and other action (unspecified!) in consultation with the Environment Agency and the Lead Local Flood Authority.....*”

DEF can see no real tools here to ensure that the policies are achieved. There is no time frame and there is no link to any of the suggested housing developments in the Local Plan.

Included files

Title Environment and Biodiversity

ID EGS10679

Person ID 1161079

Full Name Melanie Llewellyn

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment The lack of water supply without further illegal abstraction from our unique chalk streams renders all DCB’s policy statements about the environment and biodiversity meaningless and vacuous.

Included files

Title Environment and Biodiversity

ID EGS10741

Person ID 1145586

Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.</p> <p>Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.</p> <p>[PLEASE SEE ATTACHED IMAGE]</p> <p>The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.</p> <p>The plan should also guarantee the following:</p> <ul style="list-style-type: none"> • Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices • Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted • All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 0 Calculator. • Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution. • Control of polluted waters discharge to non-mains drainage prohibited. • Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights. • Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees

- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files [What is Green Infrastructure - image.jpg](#)

Title Environment and Biodiversity

ID EGS10752

Person ID 1268754

Full Name Mrs Rebecca Lumsdon

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity 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 Environment and Biodiversity

ID	EGS10936
Person ID	1268871
Full Name	Ms Karla Hatrick
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<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>

Included files	
Title	Environment and Biodiversity
ID	EGS11128
Person ID	1268953
Full Name	Ms Susan Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	4 Whilst policy on biodiversity is clearly laid out in the draft Plan, there are no explicit plans for mitigation of loss of green space and carbon reduction. This can only be achieved by the co-operation of developers, which is seldom willingly forthcoming.
Included files	
Title	Environment and Biodiversity
ID	EGS11190
Person ID	1268980
Full Name	Ian and Pamela Gamble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	With regard to both 'Climate and Sustainability' and 'Environment and Biodiversity' sections we would comment as follows:

All the areas picked for housing on the southern edge of Berkhamsted are rich in biodiversity and so you cannot possibly say that your plans will enhance species/biodiversity richness. Biodiversity will plummet if you action these plans. Let me explain please:-

The areas that have been proposed for housing along the southern boundary of Berkhamsted were historically part of two large estates, namely the Haresfoot and Ashlyns Estates, which were owned by the Smith and Dorien families. One feature of the several plots of land highlighted namely, Hanburys, Haslam Fields and BFI sites, is the veteran Pedunculate Oaks *Quercus robur* many of which are several hundred years old. These trees can be found in the old hedgerows hereabouts and line the southern edge of the Shootersway road. Some of the trees show dead timber in their crowns which is natural and doesn't mean the trees have disease. It is these trees that are most biodiverse with the dead timber holding a wealth of invertebrates. These trees are a treasured possession and should be saved at all costs. The general hedgerows are also very rich in this area holding a wide variety of shrubs and trees. The Purple Emperor butterfly has been recorded twice recently in this area. This is a Nationally Scarce 'B' species. The Purple Hairstreak, another local butterfly, is present on the oaks in the area. Two species of moth that are categorised as 'Vulnerable' in Hertfordshire, the Pretty Chalk Carpet and the Alder Moth have been recorded here and two threatened Hertfordshire moth species the White Satin and Brindled Beauty are frequent.

In 2007 the UK Biodiversity Action Plan put together a list of 71 species that were nationally common and widespread but were rapidly declining, for monitoring. Of the 71 species, 61 occur in Hertfordshire. Of the 61 Hertfordshire species, 24 occur within your proposed building area.

Three other moths are worth a mention here: The Mocha, a Nationally scarce 'B' species, has been recorded here and of the four modern Hertfordshire records, two come from south Berkhamsted. This is a rare moth which is found in southern Britain. It is extremely local in the Chilterns where its food plant is Field Maple. Another local species of South West Britain and a rare species in Hertfordshire with only a dozen records, the Square Spot moth has been recorded within your building area and it is interesting to note that a second was seen close to the building area being found in Hockeridge Wood. This species' larval food plant is oak and other trees. The last interesting species found in this area was the Hemp Agrimony Plume moth with only 20 or so Hertfordshire records.

You must also realise that planting new trees after the removal of old trees is, in one sense, futile. The new trees will have little biodiversity and the amount of photosynthesis they can achieve will be minute compared to a mature tree. The world has serious problems which require immediate action but we see local government and national government paying lip service to climate change and biodiversity. This can be seen with your plans to remove the green belt and in the national government's desire to push through HS2 destroying many important habitats in the Chilterns. Britain is the least biodiverse nation in Europe and unfortunately, if we don't put nature first and give it greater protection our own human survival will be put at risk! An ancient woodland by its name takes hundreds of years to develop and cannot be recreated even in a hundred years, we simply don't have that long.

You are correct in saying the Chilterns is one of the richest areas for biodiversity in Britain. The area holds many rare and localised species some of which are restricted to the Chilterns, for example, the Chiltern Gentian, whilst others are also only found in a few localities outside the Chilterns, for example, the Military Orchid and the Monkey Orchid. Chalk

downland is botanically the richest landscape in Britain with more species found in a square metre than in any other habitat.

If we have learnt one thing from the Covid pandemic, it is that our Areas of Outstanding Natural Beauty across Britain and in the Chilterns have suffered with the sheer numbers of people using them for recreation. Putting upwards of 16,000 houses on the edge of Ivinghoe Beacon, College Lake, Tring Reservoirs and the Ashridge Estate will only lead to the loss of more biodiversity, due to exploitation by man. Many people walk in these areas with several dogs that have the effect of altering the chemical makeup of the soil due to their urine, destroying the unique flora. Dogs also disturb ground-feeding and ground-nesting birds and animals. Some species like the Woodcock have stopped nesting in Ashridge in the time I have lived here and scarce species such as the Skylark will be put under threat by the countless dogs and people.

These developments do not allow wildlife to even co-exist with us at the current levels and will severely degrade their life chances of survival. I would like to see both councils and national government alike start to preserve natural habitats for their own sake and the sake of biodiversity and not to save them just to exploit them for his own recreation, because the two are not really compatible.

We note under your Guiding Development Section Summary that ‘you will ensure that existing trees are retained and protected’ and so with all that we have said about the oak trees and hedgerow trees above in South Berkhamsted we would expect all these trees to survive in your detailed development plan. We would also ask that the ancient hedgerows themselves are preserved with their associated trees. Many of the important trees are not so large such as the Sallow and Field Maple and need saving, since for example the Sallow is the larval food plant of the Purple Emperor butterfly. When you have read these comments, please can you explain to us how you are ‘making a 10% gain in biodiversity’ as written into this summary section of yours.

Included files	
Title	Environment and Biodiversity
ID	EGS11268
Person ID	221884
Full Name	Ms Eliza Hermann
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	Policy DM31 regarding the Chilterns Beechwoods SAC and Policy DM32 regarding Ashridge do not go far enough in protecting these environments from damaging over-use, both from the large number of visitors and from pollution.
Included files	
Title	Environment and Biodiversity
ID	EGS11305
Person ID	1268999
Full Name	Mr Birkett Birkett
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	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. 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...!
Included files	
Title	Environment and Biodiversity
ID	EGS11346
Person ID	1269008
Full Name	Mr Steven Kerry
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

<p>* Yes</p> <p>* No</p>	
<p>Environment and Biodiversity comment</p>	<p><u>DM27 – Landscape Character & Chilterns AONB</u></p> <p>We object to Policy DM27 on the basis that point 4 of the policy requires all major development located outside of the settlement areas to provide a Landscape and Visual Impact Assessment. In theory, this would mean that schemes as small as 11 units on sites adjoining the existing settlement area would have to provide an LVIA as part of the application requirements. This is considered excessive and disproportionate. Whilst we agree that LVIA's are important documents, their use needs to be adequately justified. In areas of high landscape value such as AONBs LVIA's are core documents. Small extensions to settlements outside of designated landscape areas should not be required to provide an LVIA. We consider in such cases there should be more appropriate threshold for requiring these documents. In our view this would take the form of schemes which exceed 10% growth of a settlement and are located at the settlement edge.</p> <p><u>DM36 – Tree Retention and Protection</u></p> <p>We object to Policy DM36 on the basis that a number of the requirements are excessive and would be detrimental to the delivery of small sites for development.</p> <p>Firstly, it requires all new development to provide two new trees per dwelling. Whilst the intention of the policy is supported, in practice there may not be the required space on smaller sites to meet this requirement, particularly where there is the requirement to provide other on-site infrastructure, SUDs for example, or other habitats. As such there needs to be a degree of flexibility in the wording of the policy to states <i>'unless otherwise justified that there is not the space to provide the required number of trees on site.'</i></p> <p>Similarly, the requirement to provide three new like for like trees on site where a tree is lost through development places an unfair burden on small sites and lacks flexibility. It is usually the case that trees are proposed for removal as a last resort therefore there is no guarantee three new trees can be planted on site even in different locations to the removed specimen. In principle we support the intention of this requirement to boost tree cover across the Borough generally, however the same flexibilities suggested above need to be referenced in this requirement.</p> <p>Finally, point 5 states trees covered by a TPO will only be permitted for removal if it has ill health or poses a significant safety concern. We would like to point out that not all trees covered by TPO are of good quality and this is usually the case with blanket TPO designations. In some instances, it may be the case that development on an otherwise suitable site may have to remove a small section of TPO trees in order to facilitate the scheme, for example to provide a suitable site access. Such trees could include low-quality self-sown specimens which although have no health issues do have reduced value in their retention. The policy as currently worded restricts the removal of these trees and therefore is unduly restrictive.</p>
<p>Included files</p>	
<p>Title</p>	<p>Environment and Biodiversity</p>
<p>ID</p>	<p>EGS11386</p>

Person ID	1207629
Full Name	Strategic Planning Department
Organisation Details	Strategic Planning Department Three Rivers District Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	Policy DM36 – Tree Retention and Protection: We do not feel that a requirement for a minimum of two or more trees to be planted per dwelling on-site can be applied; whilst the importance and benefits of tree-planting is recognised, there will likely be instances where sites cannot accommodate two or more trees per dwelling (particularly on smaller sites and flatted developments). As such, this policy requirement will not be appropriate or practically achievable. It would be helpful if this were recognised in the supporting text and an alternative option of other planting to be suggested in policy where the proposal to plant two or more trees per dwelling is not appropriate.
Included files	
Title	Environment and Biodiversity
ID	EGS11445
Person ID	1264362
Full Name	Juliet Miller
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.

Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.

<https://www.eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure>

The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.

The plan should also guarantee the following:

- Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate
- Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be
- All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 0 Calculator.
- Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.
- Control of polluted waters discharge to non-mains drainage
- Developments must be designed to ensure the lowest possible light pollution and utilise low energy

- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained
- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files

Title Environment and Biodiversity

ID EGS11529

Person ID 1269119

Full Name JENNIFER BLOGG

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

The Bulbourne is threatened by low flows and a recent Environment Agency study has concluded that unsustainable levels of abstraction for public water supply are contributing to low flows, and abstraction reductions have been proposed. In the summer of 2019 one leaking canal lock gate, at Lock 48, at Dudswell wasted 2.7 mega litres a day. That is equivalent to the daily use of water by the whole of Berkhamsted. The Bulbourne water quality is deteriorating, despite attempts at improving it. How will any development on this river help the river and all the natural wildlife surrounding it?

I strongly object to any building work that mean the loss of such an extent of wildlife that includes Herons, Egrets, foxes, kingfishers, goldfinches, deer, crayfish, minnows, hedgehogs, squirrels and robins.

Hedgehogs are classified by ICUN as vulnerable to extinction. They are protected in the UK under the Wildlife and Countryside Act, 1981; Priority Species under the UK Post-2010 Biodiversity Framework and the IUCN Red List for British Mammals. This sighting is now lodged on the Herts Environmental Records Centre database.

As a chalk river, the River Bulbourne is of international significance and it falls into the category of a priority habitat under the Natural Environment & Rural Communities Act 2006 (S41). Many species living in it and along the banks rely on a sustained flow of water which is normal in a natural chalk stream fed partly by underground springs like the Bulbourne. A recent case study by 1S. Wilson provides evidence that the Rivers Bulbourne and Gade no longer behave as chalk streams should. He demonstrates that rapid rise and fall in the water levels are more typical of urban run-off than chalk streams and he observed flooding. Surface water running off hard-standing (roads, paths, rooftops, etc) is rapidly directed via drains into these rivers during periods of medium and high rainfall causing the water levels to quickly rise and fall. What should be clear water often becomes cloudy due to silt, rubbish and pollutants. Progressive silting and growth of vegetation in the water channels reduce the flow of water and increase the risk of flooding. - Will buildings and roads increase the probability of damage to the river ecosystem and some homes being flooded? As these rivers are of global significance, should the Local Plan incorporate measures to restore and protect them? Dacorum Borough Council have a duty to have due regard to the conservation of biodiversity under the Natural Environment and Rural Communities Act 2006 (S40). Those habitats and species which are of principal importance for the conservation of biodiversity in England are listed in Section 41 and include the House Sparrow, Cinnabar Moth and Great Crested Newt. s biodiversity likely to be increased, or diminished at the proposed development sites? What specific biodiversity, green infrastructure or compensating measures do you think should be recognised in the various site plans? Are Local Authority measures in place to ensure that developers adhere to a development plan after Planning Permission is granted and before any long-term biodiversity damage occurs?

Included files

Title Environment and Biodiversity

ID EGS11595

Person ID 1269148

Full Name SIMON AND ANNA BARNARD

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Policy DM30 - Biodiversity Gain - A clear and ambitious strategy is needed to mitigate the damage already done to the Borough's habitats and wildlife. Back in September 2010 the Hertfordshire Biodiversity Action Plan identified a series of priority habitats for Hertfordshire. These include:</p> <ul style="list-style-type: none"> - Key habitats of which there is a significant proportion of the UK resource in Hertfordshire. Hertfordshire has special responsibility for these and are therefore a priority for action: Chalk rivers (the Ver, Gade and Bulbourne) and lowland beech woods which are of national importance. - Key habitats which have declined in the recent past or are still declining locally. These habitats are directly threatened and must therefore be a priority for action: Ancient species rich hedgerows, lowland acidic grassland and lowland heathland and lowland calcareous grassland. - Key habitats which are locally rare and/or threatened and therefore require conservation action: lowland hay meadow, floodplain grazing marsh, fens, reedbeds and cereal field margins. <p>Regrettably, in the last 10 years the Council has done little to reverse this declining trend and this Plan will accelerate it further with proposed building on flood plains, the need to extract more water from the chalk streams, building on sensitive landscapes which will decimate the hedgerows and ancient field patterns, building on agricultural fields and building up to the Nationally important Beech woods.</p> <p>This Plan is an indication that Dacorum cares little for the biodiversity in the Borough and it is development at all costs. The Council should be brave and set an example of what could be done by putting landscape and wildlife high on their agenda, not merely an afterthought following development.</p> <p>Policy DM33 - Protection and Enhancement of the River Character and Water Environment - Whilst the recognition of the importance of the chalk streams is welcomed as it has been woefully ignored up to now, and the policy should go further in seeking to restore flows and improve the water quality and ecological conditions along these watercourses. Many of the sites proposed for allocation in the Plan, particularly around Hemel Hempstead and Berkhamsted, are likely to put unacceptable increased pressure on water resources in particular and contradict the aims of this policy. Water supply is a problem across the Borough, and abstraction from the chalk streams is supposed to be being curtailed, so where would this extra supply come from? It is not sufficient to accept development and then the Water Authorities say that there is no alternative. The extra supply needed for these vast developments must be sorted before approval. Development is proposed immediately adjacent to the streams which will lead to pollution and loss of wildlife.</p> <p>Policy DM36 - Tree Retention and Protection & Policy DM37 - Landscape on Development</p>

The Council must robustly enforce the Capital Asset Value for Amenity Trees policy and fiercely support retention and provision of trees.

Included files

Title Environment and Biodiversity

ID EGS11684

Person ID 1269212

Full Name PETER SCOTT

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.

Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.

<https://www.eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure>

The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.

The plan should also guarantee the following:

- Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate
- Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted
- All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 0 Calculator.

- Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution. Control of polluted waters discharge to non-mains drainage prohibited.
- Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights
- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees
- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
 - Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files	Peter Scott Image 1 .pdf
Title	Environment and Biodiversity
ID	EGS11727
Person ID	1152494
Full Name	MRS G RUSSELL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Re: Environment & Biodiversity: Policy DM28 – the level of development desired by DBC is not of over-riding importance or public interest, and does not allow it to renege on its duties to protect the sites of biological importance, shown in Figure 8, under point18.16. As it stands, the Plan would destroy 850ha of Green Belt, countryside and urban green spaces. Re the AONB, there is a duty to protect its setting as well. Re the Chilterns Beechwoods SAC the Council has not done the screening exercise required by the Habitats Regulations Assessment to assess impacts of any proposed development, and the Strategy should not have been published before</p>

this screening has been done. The fact that Policy DM31 proposes offsite mitigation and compensatory measures implies that the Council is pre-empting the results of the screening.
 In any event, the sites shown in Figure 8 under point 18.16 are irreplaceable, and “mitigation” is therefore a nonsense.
 Re Policy DM33:
 Objectives are not action plans. See comments Re 10 above, in response to Question 2.

Included files	
Title	Environment and Biodiversity
ID	EGS11825
Person ID	350823
Full Name	Mrs Sue Yeomans
Organisation Details	Chairman Chilterns Countryside Group
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	I fully endorse the response of the Chiltern Countryside Group to this question.
Included files	
Title	Environment and Biodiversity
ID	EGS11889
Person ID	1269277
Full Name	DEFINE PLANNING AND DESIGN LTD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Policy DM28 - Protection of Sites Policy DM28 sets out at requirement 3 the ‘objectives’ that will be applied when determining planning applications that relate to sites of international, national and ‘country, sub-regional and local’ importance. However, that varied approach does not reflect the NPPF and therefore confuses, or at worst conflicts with, the NPPF. Specifically, it is unclear how a decision maker would balance this policy and NPPF paragraph 11, meaning the policy is not “<i>clearly written and unambiguous.</i>” Thus, the policy should refer to the NPPF specifically rather than setting specific requirements by level of environmental type.</p> <p>POLICY DM29 – PROTECTED SPECIES AND PRIORITY SPECIES AND HABITATS POLICY: Policy DM29 outlines how developments that impact on habitats of principal importance or habitats belonging to species of principal importance will be determined. As above, to ensure that the policy does not confuse or conflict with the NPPF, the policy should refer to the NPPF directly.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS11930
Person ID	1269347
Full Name	Rebecca Braybrooks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	We don’t have enough water to supply all the extra houses. It is a fact that the extra water needed can only be extracted from the chalk aquifer which in turn will damage the borough’s chalk rivers which are classified as priority habitats by the Natural Environment& Rural Communities Act 2006.
Included files	
Title	Environment and Biodiversity

ID	EGS11944
Person ID	1150963
Full Name	SUE TAYLOR
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p><u>Wider Countryside and Biodiversity</u> In your documents you state</p> <p><i>Natural Environment 2.19 The combined effects of climate change, population growth and development needs will increase pressure on the natural environment. As already mentioned we have a particularly sensitive environment in Dacorum in the shape of the quality of our protected landscapes (including the Chilterns AONB) and the presence of the Chilterns Beechwoods SAC.</i></p> <p>The impact on the environment must be considered on a local <u>and</u> regional scale. The Chilterns are loved by many and are a draw for recreation for people locally and from much further afield including London and Luton. The pressures on the AONB as witnessed at Ashridge are increasing annually. An additional 16,900 houses in Dacorum would see this pressure increased and the precious wildlife habitats degraded as they are visited by yet more people. Measures need to be taken to ensure the protection and enhancement of the AONB.</p> <p>Berkhamsted and to a lesser extent Tring are in a valley running through the Chiltern Hills AONB, this AONB is of such regional significance it may well become the next National Park. Therefore we have a responsibility to maintain and enhance the green corridors that connect the areas of AONB and Beechwoods SAC on either side of the valley. It is not good enough to replace existing copses, hedgerows and meadows with newly planted hedges and grassland, or to retain a tidied up degraded and fragmented version (as seen on the Bearoc development on the Durrants Lane Shootersway junction). The nature of our wildlife corridors is that many are ancient and support wildlife that cannot be translocated. Shootersway, Bell Lane and Darrs Lane are ancient probably at least 800 years old and it is probable that boundary hedges, copses and tree belts have been here that long. They need protecting and enhancing.</p> <p>Ashridge is a known nationally as an important site for Saproxyllic invertebrates associated with Ancient Woodland, other woodland along Shootersway including Hockeridge and those in and around Champneys/Rossway are not well studied but may well be of similar significance. The ancient landscape features of hedges, tree-rows and copse connect these woodlands making them more robust against loss of species. So protecting our existing hedgerows and managing them in</p>

their current state and enhancing them with additional planting protects our biodiversity on a wider scale.

The Lock field is also important as a wildlife corridor providing a strong wildlife corridor between Ashridge and the Grand Union Canal which important wildlife corridor and recreational facility.

I have made wildlife records locally (Records with iRecord and HERC) and there are several species of significance (Section 41 NERC 2006) that are found within the areas designated to be developed, mainly in the boundary features. The hedgerows, Copse and Woodland also fall under Section 41 of NERC as Priority Habitats.

The features are also very **visually important** within our landscape providing robust natural edges to the existing towns. Shootersway located on the ridge is an especially strong feature separating the town from the open countryside beyond.

I have not searched for species over the full extent of the proposed development areas, in part because they are not publicly accessible, this does not make the features and species they contain less valuable, if anything protection from disturbance has made them more valuable as wildlife corridors.

Examples of significant species (Section 41 of NERC Act 2006) that I have seen within 100m of a proposed development within the last few years are:

- Hedgehog; requiring hedgerows scrub and
- Pipistrelle Bat; requiring mature trees with rot-holes for roosts and insect rich habitats for
- Skylark; Needing open habitat with short
- Bullfinch; Needs deciduous trees especially fruit bearing ones like Blackthorn, hawthorn and fruit
- Starling; Needs a habitat
- House sparrow; Needs a mosaic habitat including scrub
- Kingfisher; Needing the Bulbourne and the grand Union canal and banks of thick undisturbed scrub adjacent the canal to perch and feed from.
- White Letter Hairstreak (Berkhamsted and Northchurch), reliant from the elm regrowth seen in only the oldest lanes in and around Berkhamsted, including Shootersway where there is a strong colony, Bell Lane, Darrs Lane, upper part of Swing Gate
- Dusky Thorn (moth); requires deciduous woodland
- Newt (seen, not recorded); Needs a habitat mosaic including water, but terrestrial habitats

I believe that the 10% net Biodiversity gain cannot be achieved given the scale of loss and fragmentation that development on these sites would require. The plan needs to be revised to ensure that the 10% gain can be achieved, and valuable habitats and wildlife corridors adequately protected both in the development phase and beyond.

Given the nature and diverse composition of the habitats under threat I would expect many more section 41 or rare species than listed above.

There are records of Small Heath and Purple Emperor butterflies along Shootersway and Bell Lane. The species recorded to date merely hint at what uncommon or threatened species are likely to be there, absence of evidence is not evidence of absence. *

Not all rare or threatened species are listed in Section 41, the vast majority are not as they can be difficult to monitor. I found Violet Helleborine, an uncommon species restricted to ancient woodland, in the trees on the southern edge of Shootersway. This is significant in that it tells us the habitat here has not changed in a very long time.

The species composition and diversity of woody and herbaceous species in Shootersway, Bell Lane and Darrs Lane also indicate these are ancient features.

Scarce species while important are just witnesses of a wider issue as the abundance of our natural resources are depleted, of these resources the oldest habitats are the most valuable and fragile.

The hedgerows and trees and patches of woodland have developed their species composition over centuries, the land they occupy has not been ploughed and will not have been treated with chemicals.

We cannot create new wildlife areas that match these special conditions, though any additional habitat provision is very welcome and must be given prominence in any future developments or changes to infrastructure.

I do have a positive recommendation, which is to identify lanes such as Bell Lane where sections can be closed to traffic and given over to walkers and cyclists, thereby increasing recreational opportunities and protecting wildlife.

* In December 2018 I found *Boreus hyemalis* (Snow flea) in Hockeridge, less than 500m from one of the proposed developments, it is its only known location in Buckinghamshire there are none known in Herts, it can only be found in winter. This shows how rare species may be hard to survey for, especially over a short time usually in spring or summer when most ecological assessments are made, it does not make these species less important.

The River Bulbourne is internationally important as a Chalk stream it was named for its origin at Bulbourne. It is fed from the local chalk aquifer and is to some extent seasonal.

In my lifetime the starting point for the Bulbourne has crept ever closer to Berkhamsted, increasingly drying out in the summer due to increased abstraction. At the same time it has become more

polluted from surface runoff as more of our urban greenspace, verges and gardens are tarmac'd over and drains allowed to silt up. (Cross Oak Road they are full to the brim with silt).

Ironically as the springs dry up the Bulbourne is more likely to flood as climate change brings unpredictable heavy rain, increased hard surfacing will add to the risk of intermittent flooding.

The field at Dudswell holds an important area of rare chalk reedbed habitat worthy of special protection, it will be damaged by increased abstraction.

The increase of population proposed will mean that additional abstraction of water is required especially in summer and drought conditions. I understand a recent report (either for a water company or DBC) found that this was unsustainable and that new water sources could not be found until 2030 threatening both peoples water security and further damaging the Chalk streams in our borough.

This aquifer is also the same one that is likely to have been contaminated by the Buncefield incident, increasing the rate of abstraction will bring forward the date when pollution in our abstracted water is measurable.

The current local plan does not therefore meet the needs of the local community as regards to either water provision or protection of the Chalk streams.

There is a history of sink holes in the town, the most recently identified at the BFI at the top of Kings Road. Reducing the water table increases the risk of active sink holes. There are possible signs of sinkholes in the field between Darrs Lane and Bell Lane, visible from Bell Lane, these require investigation and if found may indicate issues for building in similar locations either side of Shootersway.

Included files

Title Environment and Biodiversity

ID EGS12023

Person ID 1161359

Full Name D B Land and Planning

Organisation Details D B Land and Planning

Agent ID 1161362

Agent Name Nathan
McLoughlin

Agent Organisation McLoughlin Planning

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

Policy DM27 – Landscape character and Chilterns Area of Outstanding Natural Beauty
The concern with the policy as drafted is that it appears to apply the same level of landscape protection and consideration to development sites adjacent to but outside the AONB as much as to sites within the AONB.

DBLP readily recognises that great weight should be given to the preservation of the character and scenic beauty of the AONB. However, locations outside of it but immediately adjacent to it are not bound by the same rules in the NPPF. In addition, under part 2D of the policy, reference is made to the “statutory” Chilterns AONB Management Plan and the need to make practical and financial contributions towards the Management Plan arising from new development proposals. This requirement is irrespective of whether the development site is within or adjacent to the AONB. The issue with 2D is that an AONB Management Plan is not a statutory planning document (as set out in the NPPG) but such documents set out the strategic context for development. It is not clear how this approach would meet the policy requirements

planning obligations. In terms of dealing with sites adjacent to the AONB, the policy should be reworded to reflect the NPPG’s requirements that these areas need “sensitive handling”, rather than seeking to apply AONB policy to such locations.

Part 3 of the policy makes reference to the Dacorum Key Landscape Character Assessment 2004 SPD as a tool in assisting the determination of Planning Applications. The reliance a document so old simply fails to test in paragraph 31 of the Framework, which requires Plans to be prepared with up-to-date evidence. A 2004 SPD clearly is not up to date. Reference to this document should be deleted and the Plan should be accompanied by a review of the SPD that brings it up to date.

Policy DM31 – Chilterns Beechwood Special Area of Conservation (SAC)

The need to protect the SAC is recognised. However, there is no information in the Plan or on the Proposals Map defining the extent of the SAC. Therefore, it is not possible to understand where development sites are in relation to the extent of the SAC and the “zones of influence”. The Policies Map needs to be updated to reflect this so that decisions can be made in respect of understanding where the zones of influence are.

Policy DM35 – Protection from Environmental Pollution

The need to protect new development from environmental pollution is understood and recognised. However, there is concern about the drafting of the requirements relating to light pollution in the policy in that they are considered to be unduly onerous. The policy seeks to prevent any “harm” to the environment. It is considered that this is a general term that does not look to qualify at what level of harm is unacceptable. In terms of dealing with light pollution, the policy requires considerable levels of detail to be provided in terms of light spill arising from new developments.

Given the information that is provided it inevitably leads to the question as to whether the policy would be used to impose restrictive conditions on any new development and what the nature of those conditions would be. Whilst the genuine desire is to avoid light pollution in the countryside is understood, existing and proposed residential development will obviously require some form of external street lighting to allow occupants of that development to move around during hours of darkness. Also, street lighting performs an important role in creating safe neighbourhoods and deterring risks of crime.

Included files	
Title	Environment and Biodiversity
ID	EGS12088
Person ID	1269386
Full Name	KERR LINDA
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Environment and Biodiversity Tring is on the edge of the Chilterns AONB and as such is part of the landscape overlooked by the Ridgeway National Trail. This area is established as a desirable destination for leisure purposes, in particular walking. It seems contradictory to start introducing settlement in an area of green belt when it should be protected for wildlife and outdoor leisure.
Included files	
Title	Environment and Biodiversity
ID	EGS12127
Person ID	1165624
Full Name	Mr & Mrs Else
Organisation Details	Mr Richard Butler, Associate C/O Bidwells
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	My client is the owner of Edgeworth House and the associated private garden to the rear of the property (“the site”), which equates to approximately 1.6ha in size. Edgeworth House is a Grade II* Listed building and the site comprises associated ancillary buildings which are also located adjacent to the High Street along the site’s southern boundary. The site has a very good frontage onto the High Street with three existing access points. A section of the River Bulbourne crosses through the site and the northern boundary abuts the Grand Union Canal. There is no public access to the site and historically there has never been public access to the site. The site is fully enclosed with hedges and fences on all sides.

To the west of the site are existing 2-storey residential properties of Bulbourne Close and Valley Road where the River Bulbourne is culverted under the road. Opposite the site frontage along the High Street to the south are 2-storey residential properties and to the east of the site are 3-storey apartment blocks of Turner Court and a builders' merchants further to the north on the Sarthe Business Park.

My client made previous representations (objection) to the Council in respect of the Site Allocations Development Plan Document (DPD) that was adopted in July 2017.

In summary, the site is identified as an Open Land designation on the Policies Map of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. My client strongly objects to the identification of the site as an Open Land designation in the Emerging Strategy for Growth for reasons set out further below. My client requests 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 this consultation. The site can contribute towards the Borough's housing needs through a windfall housing site; the Open Land designation must therefore be omitted.

My client considers the Council is not sufficiently following the NPPF, in particularly paragraph 68 which encourages strategic policy-making authorities to identify small and medium sized sites that can make an important contribution to meeting the housing requirement of an area, including the identification of land to accommodate at least 10% of their housing on sites no larger than one hectare; and supporting the development of windfall sites, giving weight to the benefits of using suitable sites within existing settlement for homes. Edgeworth House would be a suitable housing site in this regard.

The Edgeworth House site is also well served by public transport again a priority in the NPPF, in particularly chapter 9 which seeks to promote sustainable transport and paragraph 108 which seeks to ensure appropriate opportunities to promote sustainable transport modes can be taken up, in assessing sites that may be allocated for development.

Review of Council's Previous Assessment Work

The Policies Map for the Dacorum Borough Local Plan 1991-2011 did not previously identify the site as an Open Land designation.

Following adoption of the Core Strategy by the Council in 2013, the site was identified as an Open Land designation in the Site Allocations DPD which was adopted in 2017.

As part of the Council's initial preparation of the Site Allocations DPD, a total of 25 sites were considered for a new Open Land designation within the Borough as part of the Site Allocations Background Issues Paper (June 2015) (SABIP). Edgeworth House represented the only site of 5 considered in Berkhamsted that was progressed towards an Open Land designation.

It was clear from the level of dismissed sites that the criteria required to justify an Open Land designation was high. As noted in the SABIP, the criteria included a size threshold of 1ha; the consideration of proposed uses of the site; and built form.

Edgeworth House is referenced in a number of documents forming the evidence base for the Core Strategy and associated Site Allocations DPD documents. There is a marked inconsistency in how the Local Authority has considered the site and various conclusions drawn relating to Edgeworth House. These are documented below:

- 2006 – Strategic Housing Land Availability Assessment (SHLAA) documents notes the site as appropriate for circa 11 dwellings under site BW/9.
- 2008 – Open Space Study notes that the opportunity could be taken to include part of the Edgeworth House site closest to the canal as open land
- 2013 – the adopted Core Strategy defines Open Land as areas greater than 1ha. The Edgeworth House Garden closest to the canal measures only 5700sqm. The other land in the gardens of Edgeworth House was added to achieve the 1ha
- 2014 – The Site Allocations Background Issues Paper considers the site and makes the following comments, *“The green space here forms the back garden of the dwelling and **not appropriate to allocate as Open Land**. Site also affected by watercourse and floodplains, meaning scope for development may be restricted. 1.6 ha.”* This conclusion would note that the site should not be allocated as Open
- 2015 – The Site Allocations Background Issues Paper, notes the following comments in relation to the site, *“The green space here forms the back garden of the dwelling and extends 1.6Ha. Site affected by watercourse and floodplains, but land contributes to urban form, would extend the existing green/ corridor/ Open land associated with the canal and enhances the character of the*

listed building.” The previous comments from the 2014 study are simply dismissed with very limited explanation other than, an error was made. My client also considers the Council was in breach of its obligations throughout the earlier phases of the above procedure of putting the site forward as Open Land since at no point did they advise the owners of Edgeworth House of their intentions or proposals. Furthermore, contrary to what the Council has said there appeared little or no real support for designating Edgeworth House as Open Land in 2017 outside the Council. The garden at Edgeworth House appears to be the only private garden land in Berkhamsted classified this way.

The previous work undertaken by the Council identifies clear inconsistency in the comments noted across the assessments and highlights the lack of justification for the continued designation of Open Land and lack of real technical input into the assessment.

The assessments provide a reasonable identification of the positive elements of the site; the open nature at the northern edge close to a water environment of high habitat value; the absence of built form and the presence of trees that contribute to the urban environment. However, the assertion in the assessments is that the Open Land allocation will form an extension the wider designation; provide a buffer between residential and employment uses; and enhance the setting of the Listed Building are all false. The designation of Open Land makes no change to these matters. The habitat of the canal green corridor will not be extended and is already there in situ.

The protection of habitat; setting of the Listed building and protection of any TPO (Tree Protection Orders) trees can be maintained through normal planning control. Furthermore, the exclusion of garden land from the definition of previously developed land in the NPPF reinforces this position; protection from unsuitable development, and focus to maintain important landscape features is ensured.

In summary to the previous assessment work undertaken by the Council, there have not been any substantial reasons given to how the Open Land designation of the site at Edgeworth House shall contribute to the provision of genuine Open Land within Berkhamsted.

Emerging Strategy for Growth

The Policies Map of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth identifies the site at Edgeworth House as an Open Land designation.

The Open Land designation in the Policies Map is supported by Policy DM38 'Open Land' in the Emerging Strategy for Growth which seeks to protect designated Open Land that forms part of the urban structure of the towns and larger villages. Furthermore, new development within designated Open Land will only be acceptable if it is for sports, recreation of other community or social uses and satisfies a number of conditions as set out under the policy.

Underneath Policy DM38 on page 132 of the Emerging Strategy for Growth, the relevant evidence and supporting guidance that has helped support the Council's justification of the policy simply states: 'Policies Map'. The Policies Map is not evidence or justification – it is part of the outcome of the assessment work and itself is justified by the evidence.

The Emerging Strategy for Growth is accompanied with a number of other evidence base documents and topic papers in order to inform the draft policies as set out in the Emerging Strategy for Growth.

The evidence base document Review of Green Space Strategy 2011-2016 (dated January 2011) sets out the Council's vision and plan to deliver improved public spaces within the Borough. The Strategy recommends that all formal and informal recreation space is designated as Open Land including open

space, allotments and school sites. The Strategy makes no reference to any recommendations to designate private gardens as Open Land and provides no specific reference or justification towards the designation of Edgeworth House as Open Land.

It is also noted that the Emerging Strategy for Growth is accompanied by an Open Space Study Assessment Report & Standards Paper (both dated July 2019) and topic paper Open Space, Sport and Leisure (dated November 2020). Again, neither of these documents provides specific reference or justification towards the designation of Edgeworth House as Open Land.

We note that the Emerging Strategy for Growth is also supported by an Interim Sustainability Appraisal Report (dated November 2020). The report states that *"policies aimed at protecting open spaces and limiting development in the countryside and on open land ('DM38 – open land', 'DM63 - Open Space Provision', 'SP28 - Delivering Growth in the Countryside') should help to preserve the natural environment and biodiversity. This could lead to indirect positive effects on soils."*

In respect of Edgeworth House, the site is private land and not used for agricultural purposes, therefore the designation of Open Land will have no positive effects on soils. The Emerging Strategy for Growth already identifies suitable policies for the preservation of the natural environment and biodiversity. The designation of Open Land at Edgeworth House is therefore not reasonably justified.

The Interim Sustainability Appraisal Report also states: *"Significant positive effects have been identified in relation to this objective for the policies under the 'Environment and Biodiversity' theme, with "DM38 – Open Land' protecting open*

land from residential development and requiring that any development on open land must not adversely affect character or environment of the setting.”

Furthermore, the Appendices of Interim Sustainability Appraisal Report states: *“DM38 would protect open land from residential development and require that any development on open land must not adversely affect character or environment of the setting.” (page D-32).*”

The Interim Sustainability Appraisal Report simply asserts that there would be significant positive effects with protecting Open Land from residential development, without any clear justification or reasoning.

In summary, my client strongly objects to the continued identification of the site as an Open Land designation in the Policies Map of the Emerging Strategy for Growth. We object to Policy DM38 on the basis that there is a clear lack of evidence in the Emerging Strategy for Growth to support the justification of the policy and the associated designation of Edgeworth House in the Policies Map. My client requests 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 this consultation.

My client notes that chapter 11 of the NPPF encourages planning policies to make effective use of land, in particularly paragraph 118 which promotes development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained. Further, paragraph 137 states that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, it should be demonstrated that all other reasonable options for meeting identified need for development have been examined fully. Whilst it may be necessary for Green Belt land to come forward for development due to housing need pressures, sites such as Edgeworth House should be considered as a priority as this approach is consistent with the NPPF. Our client considers that Edgeworth House as a site for housing has not been fully assessed by the Council as a priority ahead of Green Belt sites released for housing.

Furthermore, retention of an Open Land designation and not permitting controlled development on the Edgeworth House site will actually detract from available Open Space in Berkhamsted. Such a policy would see the area remain hidden behind hedges and fences with the benefit restricted only to the owners of

Edgeworth House. Permitting development could open up a significant part of the site to a much wider public, increasing access to the River Bulbourne and actually increasing the amount of true Open Space in Berkhamsted.

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.

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	
Title	Environment and Biodiversity
ID	EGS12131
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	
Environment and Biodiversity comment	1 Environment & Biodiversity Policies DM27 to DM 38 No objections
Included files	
Title	Environment and Biodiversity
ID	EGS12277
Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	? Trees and woodland are very valuable to the environment . physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area. ? An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.

Included files	
Title	Environment and Biodiversity
ID	EGS12330
Person ID	1269489
Full Name	STEVE HILL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity 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	Environment and Biodiversity
ID	EGS12337
Person ID	1269490
Full Name	MIKE WHIT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	In 2019 the Glover Report, carried out for DEFRA, recommended that the Chilterns AONB should become England's next National Park, but DBC seems to be ignoring this

To build housing upon greenbelt in the Chilterns is contrary to national policy and the Chilterns Conservation Board (CCB) Management Plan 2019-24 and its Position Statement Development Affecting the Setting of the Chilterns AONB (2011, revised 2014).

DBC must take the CCB Management Plan into account when developing local plans. DBC have a legal duty towards the AONB. The local plan has also been set out before completion of a screening exercise to establish the result of proposed developments on the Chilterns Beechwoods Special Area for Conservation. This site is of European importance for ecology and wildlife.

Decorum Borough Council must also carry out a Habitats Regulations Assessment (HRA).

Included files

Title Environment and Biodiversity

ID EGS12438

Person ID 1146040

Full Name Mrs Rachel Macdonald

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

Environment and Biodiversity

New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.

Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.

[SEE WHAT IS GREEN INFRASTRUCTURE IMAGE]

The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.

The plan should also guarantee the following:

- Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices
- Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted
- All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 0 Calculator.
- Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.
- Control of polluted waters discharge to non-mains drainage prohibited
- Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights
- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees
- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files	What is Green Infrastructure - image.jpg
Title	Environment and Biodiversity
ID	EGS12451
Person ID	1269507
Full Name	Andrew Calderwood
Organisation Details	Chair The Upper Gade Flyfishers and Conservation Association
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	

Environment and Biodiversity comment

Chalk streams are a globally rare habitat and in this country are protected by the Water Framework Directive.

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.

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.

Included files

Title Environment and Biodiversity

ID EGS12473

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

Environment and Biodiversity comment

8. Chilterns Beechwoods Special Area of Conservation (SAC)

SADC is raising comments regarding to Chilterns Beechwood SAC in relation to its impact on any future development within the Hemel Garden Communities. SADC generally welcome Policy DM31. Please note the typo at clause iii where part A is also denoted as iv.

We note that SANGs are considered in paragraphs 23.77, 23.131, 23.134, 23.163, 23.165 under 'key features'. However, we also consider that SANGs should be added to Policies SP16, SP21, SP24 and SP25 as part of the policy clauses for completeness and to assist delivery.

We are pleased to see that the following allocations include proposals for Suitable Alternative Natural Greenspace (SANGs):

- Growth Area HH01: North Hemel (Phase 1)
- Growth Area HH02: North Hemel (Phase 2)
- Growth Area Bk01: Land South of Berkhamsted includes designations;
- Growth Area Bk06: East of Darrs Lane;

In addition, to aid delivery, the allocation of SANGs would benefit from further details about the required scale and size. Currently this is to be decided with Natural England at outline application stage. However, this leads to uncertainty as to whether enough SANGs are being allocated to mitigate against cumulative impacts of proposed growth on the Chilterns

Beechwood SAC. The reason this is raised, is due to potential impact on the Hemel Garden Communities. SADC welcome ongoing discussions via the Duty to Cooperate to further understand this issue.

Included files

Title Environment and Biodiversity

ID EGS12484

Person ID 1269523

Full Name RORY LUMSDON

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

a chalk river, the River Bulbourne is of international significance and it falls into the category of a priority habitat under the Natural Environment & Rural Communities Act 2006 (S41). Many species living in it and along the banks rely on a sustained flow of water which is normal in a natural chalk stream fed partly by underground springs like the Bulbourne. A recent case study by 1S. Wilson provides evidence that the Rivers Bulbourne and Gade no longer behave as chalk streams should. He demonstrates that rapid rise and fall in the water levels are more typical of urban run-off than chalk streams and he observed flooding. Surface water running off

hard-standing (roads, paths, rooftops, etc) is rapidly directed via drains into these rivers during periods of medium and high rainfall causing the water levels to quickly rise and fall. What should be clear water often becomes cloudy due to silt, rubbish and pollutants. Progressive silting and growth of vegetation in the water channels reduce the flow of water and increase the risk of flooding. - Will buildings and roads increase the probability of damage to the river ecosystem and some homes being flooded? As these rivers are of global significance, should the Local Plan incorporate measures to restore and protect them? Dacorum Borough Council have a duty to have due regard to the conservation of biodiversity under the Natural Environment and Rural Communities Act 2006 (S40). Those habitats and species which are of principal importance for the conservation of biodiversity in England are listed in Section 41 and include the House Sparrow, Cinnabar Moth and Great Crested Newt. s biodiversity likely to be increased, or diminished at the proposed development sites? What specific biodiversity, green infrastructure or compensating measures do you think should be recognised in the various site plans? Are Local Authority measures in place to ensure that developers adhere to a development plan after Planning Permission is granted and before any long-term biodiversity damage occurs?

Included files	
Title	Environment and Biodiversity
ID	EGS12491
Person ID	1269524
Full Name	DAVID ATKINSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted.</p> <p>All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator.</p> <p>Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.</p> <p>Control of polluted waters discharge to non-mains drainage prohibited.</p> <p>Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights.</p> <p>Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.</p> <p>Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).</p>

If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.

Included files

Title Environment and Biodiversity

ID EGS12499

Person ID 1269525

Full Name QUENTIN HALFYARD

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

Human populations are expanding and it's something of a blessing that we are at least attempting to limit this activity to areas already occupied, rather than preferring to build entirely new towns on green belt land (although that does occur to an extent).

My concern in these proposals is the lack of attention to preservation of the existing green spaces within Hemel Hempstead, and a lack of planning to make them more available to the population as an important health resource, as a means of travel, and as a platform to encourage appreciation of the natural environment and our place within it. These spaces are supposed to be protected through initiatives such as the Green Infrastructure Plan of 2011, but rather than an increased protection of such spaces I fear that they are being eroded in order to enable the maximisation of building development.

Furthermore, walking and cycling routes should be being boosted throughout the town - particularly with the modern capability of electric cycles and scooters that make this increasingly practical (and of course environmentally acceptable). Such consideration is not evident in this plan, which means that the possibilities for further expansion of the cycling network will be lost when potential routes become blocked by more housing.

If I'm wrong about this then I would be grateful to be directed to policy documents giving a contrary view.

Included files	
Title	Environment and Biodiversity
ID	EGS12519
Person ID	1207806
Full Name	Mr Chris Graebe
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	On Policy DM33 - Protection and Enhancement of the River Character and Water Environment - "1.c avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments", this seems very much in conflict with the proposed overdevelopments around Berkhamsted, which will greatly increase demand for water. This will risk increasing the need to abstract water, resulting in reduced (or zero) water flow in the Bulbourne.
Included files	
Title	Environment and Biodiversity
ID	EGS12565
Person ID	1269554
Full Name	Ellen Satchwell
Organisation Details	Sustainable Development Lead Advisor - Thames Solent Team Natural England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No

Environment and Biodiversity comment

Biodiversity Net Gain

Development proposals should protect and enhance the nature conservation or geological interest of nationally important wildlife sites, as shown on the Policies map, This will be achieved by refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, as a last resort, compensated. The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations.

There is a likelihood that mandatory net gain may come forward soon. This would mean that all development would need to provide net gain. It is up to the Council to decide whether they want to futureproof their Local Plan to incorporate mandatory net gain for all developments now, or update as appropriate when mandatory net gain officially comes through. Regardless, biodiversity net gain is strongly supported by the National Planning Policy Framework (NPPF) and features prominently in the government's 25 Year Environment Plan. We therefore recommend *Policy DM30* is updated to make net gain mandatory for all development. Should you not adopt the proposal *Policy DM30* should be updated to define what a 'major development' is so that the policy can be applied consistently.

In addition, *Policy DM30 – Biodiversity Net Gain* should provide greater clarity on implementation of the Mitigation Hierarchy, to ensure on-site avoidance, mitigation and compensation is implemented prior to off-site to ensure the policy is consistent with NPPF paras. 32, 174.

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment. A strategic approach for networks of biodiversity should support a similar approach for green infrastructure. We support the production of a Green Infrastructure Strategy that would plan for GI on a more strategic level. Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.

Natural England would like to draw your attention to **Annex A** which contains useful resources as well as advice and benefits of embedding biodiversity net gain into the Local Plan.

Annex A – Biodiversity Net Gain

General advice and benefits of embedding biodiversity net gain

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The National Planning Policy Framework (NPPF) highlights the role of '*policies and decision making to minimise impacts and provide net gains for biodiversity*' (para 170)

Planning Practice Guidance describes net gain as an '*approach to development that leaves the natural environment in a measurably better state than it was beforehand*' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the Biodiversity Metric 2.0, can be used to measure gains and losses to biodiversity

resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'good practice principles' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.

Resource

Link

UK

Parliament Post: Net Gain

<https://post.parliament.uk/research-briefings/post-pb-0034/>

NE YouTube

An introduction to Biodiversity Net Gain

Biodiversity net gain: updating planning requirements

<https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

PPG

<https://www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems>

CIEEM

<https://cieem.net/i-am/current-projects/biodiversity-net-gain/>

<https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

Biodiversity Metric

<http://publications.naturalengland.org.uk/publication/5850908674228224>

The Environment Bank

<https://www.environmentbank.com/blog/the-environment-bill-and-biodiversity-net-gain-delivery-what-planning-authorities-need-to-know/>

WSP –

Biodiversity Net Gain

https://www.wsp.com/-/media/Insights/UK/Documents/Biodiversity-Net-Gain_WSP-Guide_web.pdf?la=en-GB&hash=FC7577318B01150687246A6D5C90F34CB6728120

Working for Biodiversity Net Gain

<https://documents.hants.gov.uk/hampshire2050/evidence/theme-4-environment-and-quality-of-place/supporting-evidence-and-research-reports/Theme-4-Working-for-Biodiversity-Net-Gain-BBOP.pdf>
 Includes NE
<https://www.local.gov.uk/sites/default/files/documents/Biodiversity%20Net%20Gain%20presentation%20Dec%202018.pdf>
 Wildlife Trust Briefing 2018
<https://www.wildlifetrusts.org/sites/default/files/2019-02/Net%20gain%20final%20briefing%20for%20Wildlife%20Trusts.pdf>
 Redrow Homes & Wildlife Trust
<https://www.redrow.co.uk/newsroom/national/2020/7/redrows-biodiversity-strategy-from-a-wildlife-trust-perspective>
 Natural England Blog
<https://naturalengland.blog.gov.uk/tag/net-gain/>
 Insights into Nature & Biodiversity
<https://www.ukgbc.org/wp-content/uploads/2019/01/Insights-into-Nature-and-Biodiversity-Industry-trends-commitments-and-best-practice-examples.pdf>
 British Standard
<https://standardsdevelopment.bsigroup.com/projects/2018-02413#/section>

Included files

Title	Environment and Biodiversity
ID	EGS12566
Person ID	1269554
Full Name	Ellen Satchwell
Organisation Details	Sustainable Development Lead Advisor - Thames Solent Team Natural England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Environment and Biodiversity comment	<p>Green Infrastructure (GI)</p> <p>We welcome the inclusion of Green Infrastructure. GI refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.</p> <p>A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy.</p> <p>We welcome the integration of green infrastructure into many of the policies however, we advise that a separate green infrastructure policy is created and includes a recognition of GI as defined above.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS12602
Person ID	1269554
Full Name	Ellen Satchwell
Organisation Details	Sustainable Development Lead Advisor - Thames Solent Team Natural England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
Environment and Biodiversity comment	<p><u>Landscape</u></p> <p>The plan area includes an Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area. For Areas of Outstanding Natural Beauty, the LPA should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected</p>

landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 172 of the National Planning Policy Framework (NPPF).

We welcome the inclusion of *Policy DM27 – Landscape Character and Chilterns Area of Outstanding Natural Beauty* however, we suggest the policy would be clearer if it read:

~~*Permission for major developments in the Chilterns Area of Outstanding Natural Beauty (AONB) will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it:*~~

Planning permission for any major development within the Chilterns Area of Outstanding Natural Beauty (AONB), or affecting the setting or appreciation of the AONB, will not be granted unless it can be demonstrated it:

[Insert new point] *meets exceptional circumstances as defined by national planning policy.*

Included files

Title

Environment and Biodiversity

ID

EGS12603

Person ID

1269554

Full Name

Ellen Satchwell

Organisation Details

Sustainable Development Lead Advisor - Thames Solent Team
Natural England

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

Sites of Least Environmental Value

In accordance with the paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

Protected sites

We welcome the inclusion of *Policy DM28 – Protection of Sites* however, we suggest the policy would be clearer if it read:

~~*Development proposals which are likely to cause harm to sites of nature conservation or geological interest will only be permitted in exceptional circumstances where the need for the development significantly and demonstrably outweighs the harm and where:*~~

Development proposals which are likely to cause harm to sites of nature conservation or geological interest will only be permitted in exceptional circumstances where:

[Insert new point] *the need for the development significantly and demonstrably outweighs the harm.*

Included files

Title Environment and Biodiversity

ID EGS12604

Person ID 1269554

Full Name Ellen Satchwell

Organisation Details Sustainable Development Lead Advisor - Thames Solent Team
Natural England

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

Priority habitats, ecological networks and priority and/or legally protected species populations

The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.

We welcome the inclusion of *Policy DM29 – Protected Species and Priority Species and Habitats*, however we suggest that the policy should make reference to compensation provision in line with the mitigation hierarchy. In addition the policy should be expanded to ensure protection to irreplaceable habitats, such as ancient woodland, ancient and veteran trees.

Natural England and the Forestry Commission have produced standing advice on ancient woodland, ancient and veteran trees.

Included files

Title

Environment and Biodiversity

ID

EGS12605

Person ID

1269554

Full Name

Ellen Satchwell

Organisation Details

Sustainable Development Lead Advisor - Thames Solent Team
Natural England

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

Soils

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The conservation and sustainable management of soils also is reflected in the National Planning Policy Framework (NPPF), particularly in paragraphs 170 and 171. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 118 of the NPPF, for example to:

- Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future;
- To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc); and
- Where development is proposed ensure soil resources are conserved and managed in a sustainable

Included files

Title Environment and Biodiversity

ID EGS12612

Person ID 1207604

Full Name Thames Water Planning Policy

Organisation Details C/O Savills
Thames Water Planning Policy

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

The aims of Policy DM34 on flood risk and protection are supported. However, it is considered that the wording of the policy could be amended to make it clear that development should consider all forms of flooding including sewer flooding. There is a risk that new development may not be at risk of sewer flooding itself but it could increase the risk of sewer flooding downstream of the development if sewerage network upgrades are required to support development but are not delivered ahead of occupation. In such circumstances Thames Water would seek phasing conditions to be used to ensure that the relevant phase of development is not occupied until any necessary upgrades have been completed.

The aims of Policy DM35 on pollution are supported. However, the policy should also ensure that occupiers of new development are not adversely affected by noise, odour or light from existing sources unless any necessary mitigation measures are secured and implemented.

Included files

Title Environment and Biodiversity

ID EGS12670

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	
Environment and Biodiversity comment	<p>My client is the owner of Edgeworth House and the associated private garden to the rear of the property (“the site”), which equates to approximately 1.6ha in size. Edgeworth House is a Grade II* Listed building and the site comprises associated ancillary buildings which are also located adjacent to the High Street along the site’s southern boundary. The site has a very good frontage onto the High Street with three existing access points. A section of the River Bulbourne crosses through the site and the northern boundary abuts the Grand Union Canal. There is no public access to the site and historically there has never been public access to the site. The site is fully enclosed with hedges and fences on all sides.</p> <p>To the west of the site are existing 2-storey residential properties of Bulbourne Close and Valley Road where the River Bulbourne is culverted under the road. Opposite the site frontage along the High Street to the south are 2-storey residential properties and to the east of the site are 3-storey apartment blocks of Turner Court and a builders’ merchants further to the north on the Sarthe Business Park.</p> <p>My client made previous representations (objection) to the Council in respect of the Site Allocations Development Plan Document (DPD) that was adopted in July 2017.</p> <p>In summary, the site is identified as an Open Land designation on the Policies Map of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. My client strongly objects to the identification of the site as an Open Land designation in the Emerging Strategy for Growth for reasons set out further below. My client requests 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 this consultation. The site can contribute towards the Borough’s housing needs through a windfall housing site; the Open Land designation must therefore be omitted.</p> <p>My client considers the Council is not sufficiently following the NPPF, in particularly paragraph 68 which encourages strategic policy-making authorities to identify small and medium sized sites that can make an important contribution to meeting the housing requirement of an area, including the identification of land to accommodate at least 10% of their housing on sites no larger than one hectare; and supporting the development of windfall sites, giving weight to the benefits</p>

of using suitable sites within existing settlement for homes. Edgeworth House would be a suitable housing site in this regard.

The Edgeworth House site is also well served by public transport again a priority in the NPPF, in particularly chapter 9 which seeks to promote sustainable transport and paragraph 108 which seeks to ensure appropriate opportunities to promote sustainable transport modes can be taken up, in assessing sites that may be allocated for development.

Included files

Title Environment and Biodiversity

ID EGS12675

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

Environment and Biodiversity comment

Representation to Emerging Strategy for Growth

Review of Council's Previous Assessment Work

The Policies Map for the Dacorum Borough Local Plan 1991-2011 did not previously identify the site as an Open Land designation.

Following adoption of the Core Strategy by the Council in 2013, the site was identified as an Open Land designation in the Site Allocations DPD which was adopted in 2017.

As part of the Council's initial preparation of the Site Allocations DPD, a total of 25 sites were considered for a new Open Land designation within the Borough as part of the Site Allocations Background Issues Paper (June 2015) (SABIP). Edgeworth House represented the only site of 5 considered in Berkhamsted that was progressed towards an Open Land designation.

It was clear from the level of dismissed sites that the criteria required to justify an Open Land designation was high. As noted in the SABIP, the criteria included a size threshold of 1ha; the consideration of proposed uses of the site; and built form.

Edgeworth House is referenced in a number of documents forming the evidence base for the Core Strategy and associated Site Allocations DPD documents. There is a marked inconsistency in how the Local Authority has considered the site and various conclusions drawn relating to Edgeworth House. These are documented below:

- 2006 – Strategic Housing Land Availability Assessment (SHLAA) documents notes the site as appropriate for circa 11 dwellings under site BW/9.
- 2008 – Open Space Study notes that the opportunity could be taken to include part of the Edgeworth House site closest to the canal as open land
- 2013 – the adopted Core Strategy defines Open Land as areas greater than 1ha. The Edgeworth House Garden closest to the canal measures only 5700sqm. The other land in the gardens of Edgeworth House was added to achieve the 1ha threshold
- 2014 – The Site Allocations Background Issues Paper considers the site and makes the following comments, *“The green space here forms the back garden of the dwelling and **not appropriate to allocate as Open Land**. Site also affected by watercourse and floodplains, meaning scope for development may be restricted. 1.6 ha.”* This conclusion would note that the site should not be allocated as Open Land
- 2015 – The Site Allocations Background Issues Paper, notes the following comments in relation to the site, *“The green space here forms the back garden of the dwelling and extends 1.6Ha. Site affected by watercourse and floodplains, but land contributes to urban form, would extend the existing green/ corridor/ Open land associated with the canal and enhances the character of the listed building.”* The previous comments from the 2014 study are simply dismissed with very limited explanation other than, an error was made. My client also considers the Council was in breach of its obligations throughout the earlier phases of the above procedure of putting the site forward as Open Land since at no point did they advise the owners of Edgeworth House of their intentions or proposals. Furthermore, contrary to what the Council has said there appeared little or no real support for designating Edgeworth House as Open Land in 2017 outside the Council. The garden at Edgeworth House appears to be the only private garden land in Berkhamsted classified this way.

The previous work undertaken by the Council identifies clear inconsistency in the comments noted across the assessments and highlights the lack of justification for the continued designation of Open Land and lack of real technical input into the assessment.

The assessments provide a reasonable identification of the positive elements of the site; the open nature at the northern edge close to a water environment of high habitat value; the absence of built form and the presence of trees that contribute to the urban environment. However, the assertion in the assessments is that the Open Land allocation will form an extension the wider designation; provide a buffer between residential and employment uses; and enhance the setting of the Listed Building are all false. The designation of Open Land makes no change to these matters. The habitat of the canal green corridor will not be extended and is already there in situ.

The protection of habitat; setting of the Listed building and protection of any TPO (Tree Protection Orders) trees can be maintained through normal planning control. Furthermore, the exclusion of garden land from the definition of previously developed land in the NPPF reinforces this position; protection from unsuitable development, and focus to maintain important landscape features is ensured.

In summary to the previous assessment work undertaken by the Council, there have not been any substantial reasons given to how the Open Land designation of the site at Edgeworth House shall contribute to the provision of genuine Open Land within Berkhamsted.

Emerging Strategy for Growth

The Policies Map of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth identifies the site at Edgeworth House as an Open Land designation.

The Open Land designation in the Policies Map is supported by Policy DM38 'Open Land' in the Emerging Strategy for Growth which seeks to protect designated Open Land that forms part of the urban structure of the towns and larger villages. Furthermore, new development within designated Open Land will only be acceptable if it is for sports, recreation of other community or social uses and satisfies a number of conditions as set out under the policy.

Underneath Policy DM38 on page 132 of the Emerging Strategy for Growth, the relevant evidence and supporting guidance that has helped support the Council's justification of the policy simply states: 'Policies Map'. The Policies Map is not evidence or justification – it is part of the outcome of the assessment work and itself is justified by the evidence.

The Emerging Strategy for Growth is accompanied with a number of other evidence base documents and topic papers in order to inform the draft policies as set out in the Emerging Strategy for Growth.

The evidence base document Review of Green Space Strategy 2011-2016 (dated January 2011) sets out the Council's vision and plan to deliver improved public spaces within the Borough. The Strategy recommends that all formal and informal recreation space is designated as Open Land including open space, allotments and school sites. The Strategy makes no reference to any recommendations to designate private gardens as Open Land and provides no specific reference or justification towards the designation of Edgeworth House as Open Land.

It is also noted that the Emerging Strategy for Growth is accompanied by an Open Space Study Assessment Report & Standards Paper (both dated July 2019) and topic paper Open Space, Sport and Leisure (dated November 2020). Again, neither of these documents provides specific reference or justification towards the designation of Edgeworth House as Open Land.

We note that the Emerging Strategy for Growth is also supported by an Interim Sustainability Appraisal Report (dated November 2020). The report states that *"policies aimed at protecting open spaces and limiting development in the countryside and on open land ('DM38 – open land', 'DM63 - Open Space Provision', 'SP28 - Delivering Growth in the Countryside') should help to preserve the natural environment and biodiversity. This could lead to indirect positive effects on soils."*

In respect of Edgeworth House, the site is private land and not used for agricultural purposes, therefore the designation of Open Land will have no positive effects on soils. The Emerging Strategy for Growth already identifies suitable policies

for the preservation of the natural environment and biodiversity. The designation of Open Land at Edgeworth House is therefore not reasonably justified.

The Interim Sustainability Appraisal Report also states: *“Significant positive effects have been identified in relation to this objective for the policies under the ‘Environment and Biodiversity’ theme, with “DM38 – Open Land’ protecting open land from residential development and requiring that any development on open land must not adversely affect character or environment of the setting.”*

Furthermore, the Appendices of Interim Sustainability Appraisal Report states: *“DM38 would protect open land from residential development and require that any development on open land must not adversely affect character or environment of the setting.” (page D-32).”*

The Interim Sustainability Appraisal Report simply asserts that there would be significant positive effects with protecting Open Land from residential development, without any clear justification or reasoning.

In summary, my client strongly objects to the continued identification of the site as an Open Land designation in the Policies Map of the Emerging Strategy for Growth. We object to Policy DM38 on the basis that there is a clear lack of evidence in the Emerging Strategy for Growth to support the justification of the policy and the associated designation of Edgeworth House in the Policies Map. My client requests 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 this consultation.

My client notes that chapter 11 of the NPPF encourages planning policies to make effective use of land, in particularly paragraph 118 which promotes development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained. Further, paragraph 137 states that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, it should be demonstrated that all other reasonable options for meeting identified need for development have been examined fully. Whilst it may be necessary for Green Belt land to come forward for development due to housing need pressures, sites such as Edgeworth House should be considered as a priority as this approach is consistent with the NPPF. Our client considers that Edgeworth House as a site for housing has not been fully assessed by the Council as a priority ahead of Green Belt sites released for housing.

Furthermore, retention of an Open Land designation and not permitting controlled development on the Edgeworth House site will actually detract from available Open Space in Berkhamsted. Such a policy would see the area remain hidden behind hedges and fences with the benefit restricted only to the owners of Edgeworth House. Permitting development could open up a significant part of the site to a much wider public, increasing access to the River Bulbourne and actually increasing the amount of true Open Space in Berkhamsted.

Included files

Title Environment and Biodiversity

ID EGS12741

Person ID 1250257

Full Name Kate Harwood

Organisation Details	The Gardens Trust
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Historic Designed Landscape</p> <p>Further, nowhere in this plan is there any consideration of historic designed landscapes, nationally designated or locally identified.</p> <p>Policy DM 36 must include the retention or replacement of trees as necessary in accordance with any historic design intent, in historic parks or garden or setting of listed buildings. Species and layout are important to the heritage value of these sites and need to be considered.</p> <p>Paragraph 19.1 states natural, built heritage.</p> <p>The NPPF states (Chapter 16) that locally recognised heritage assets should be also considered when weighing harm against benefit and that local authorities should not permit the loss of the whole or any part of a heritage asset without taking all reasonable steps. Dacorum Borough Council has for some years had a list of <i>Local Parks & Gardens of Historic Interest</i> which contribute both to the character of the local area and are of heritage value in themselves. This was prepared by HGT with guidance and funding from English Heritage and the maps now used by DBC Development Control for these were developed in conjunction with HGT. This list has now (2020) been updated by HGT in consultation with DBC.</p> <p>We consider that such a Local List, in addition to the nationally designated List, Schedule and Register is essential to inform policies such as DM58, DM36 and any policies dealing with built development in the towns and villages within Dacorum.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS12748
Person ID	1250256
Full Name	Herts Gardens Trust
Organisation Details	Herts Gardens Trust
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Historic Designed Landscape</p> <p>Further, nowhere in this plan is there any consideration of historic designed landscapes, nationally designated or locally identified.</p> <p>Policy DM 36 must include the retention or replacement of trees as necessary in accordance with any historic design intent, in historic parks or garden or setting of listed buildings. Species and layout are important to the heritage value of these sites and need to be considered.</p> <p>Paragraph 19.1 states natural, built heritage.</p> <p>The NPPF states (Chapter 16) that locally recognised heritage assets should be also considered when weighing harm against benefit and that local authorities should not permit the loss of the whole or any part of a heritage asset without taking all reasonable steps. Dacorum Borough Council has for some years had a list of <i>Local Parks & Gardens of Historic Interest</i> which contribute both to the character of the local area and are of heritage value in themselves. This was prepared by HGT with guidance and funding from English Heritage and the maps now used by DBC Development Control for these were developed in conjunction with HGT. This list has now (2020) been updated by HGT in consultation with DBC.</p> <p>We consider that such a Local List, in addition to the nationally designated List, Schedule and Register is essential to inform policies such as DM58, DM36 and any policies dealing with built development in the towns and villages within Dacorum.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS12844
Person ID	1145801
Full Name	Mr Guy Barlow
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Environment and Biodiversity comment	Developers should be selected based on minimising their environmental impact and demonstrating how they propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.
Included files	
Title	Environment and Biodiversity
ID	EGS12877
Person ID	1269665
Full Name	Mr Martin Hicks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>1 Environment and Biodiversity</p> <p>18.5 The Environment Bill proposes that the Duty should be to conserve ‘and enhance’ Biodiversity, placing emphasis on improving it, not just maintaining it.</p> <p>Policy DM27 is supported. However, the aspiration that ‘1. All development shall help conserve, restore or enhance the prevailing quality, character and condition of Dacorum’s natural and historic landscape’ is clearly unachievable given in many sites allocations, it will be built on and therefore, by default, destroyed. All rural area development will fundamentally change the existing rural character to an urban one and move the peri-urban fringe environment even further into open countryside and towards nationally important sites and landscapes. As worded, this approach is wholly undeliverable and consequently, unsustainable.</p> <p>18.17 There should be clarification of the term ‘nature reserves’ as LPAs persistently present an inaccurate impression of this resource. Any site can be managed as a nature reserve should it be owned or leased for that purpose. All are likely to be of at least Local Wildlife Site quality. Some may also be Local Nature Reserves (two in Dacorum), a formal, statutory designation where there is a local authority agreement and endorsement from NE. Some reserves may be managed by a wildlife organisation. Any of these aforementioned sites could also be SSSIs – in Dacorum three are - Alpine Meadow, Aldbury Nowers and Tring Reservoirs.</p>

There should be an additional paragraph to reflect the following Gov UK natural environment guidance (Paragraph: 013 Reference ID: 8-013-20190721 Revision date: 21 07 2019):

Locally designated 'Local Wildlife Sites' and 'Local Geological Sites' are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution.

National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.

Policy DM28 protection of sites is supported. The mitigation hierarchy 2b is better described as avoidance, mitigation and compensation, as clearly outlined by Government: <https://www.gov.uk/guidance/natural-environment>

Policy DM29 protected / priority species and habitats, is supported.

In respect of Biodiversity Net Gain, the supporting text 18.25 should incorporate the following in respect of the mitigation hierarchy: 'It does not override the protection for designated sites, protected or priority species and irreplaceable or priority habitats set out in the NPPF. Local planning authorities need to ensure that habitat improvement will be a genuine additional benefit, and go further than measures already required to implement a compensation strategy'. (Ref Gov UK).

The last sentence is a little ambiguous; it should more clearly state: 'use of the metric does not avoid the LPA's need to seek expert ecological scrutiny and advice where it is provided'.

Policy DM30 Biodiversity Net Gain is supported, although the approach is not yet law. The wording forward-proofs the expected mandatory requirement in the 2020 Environment Bill.

Chilterns Beechwood SAC

18.29 should use the recognised term SANG – Suitable Alternative Natural Green Space.

Policy DM31 – Chilterns Beechwoods Special Area of Conservation is supported.

However, whilst protection of the SAC is a legal requirement, I remain concerned that the impact on other fragile sites – particularly grasslands - resulting from the development proposals – has not been recognised in the plan. This has been recently exacerbated by BDC's approval of a new car park within metres of Tring Park, which is already suffering damaging impacts from increasing recreational pressure.

Policy DM33 - Protection and Enhancement of the River Character and Water Environment is supported.

Policy DM35 - Protection from Environmental Pollution is supported.

Tree Retention and Protection Supporting text 18.62 should also include orchards, once a widespread feature of both rural and urban areas. These have local landscape, biodiversity and ecosystem service roles (such as food, pollination, water retention and local climate amelioration) and should be conserved, enhanced and planted where appropriate.

Policy DM36 - Tree Retention and Protection is supported.
 Policy DM37 - Landscaping on Development Sites is supported.
 Policy DM38 - Open Land is supported.

Included files

Title Environment and Biodiversity

ID EGS12887

Person ID 1207443

Full Name Mrs Jennifer Bissmire

Organisation Details Clerk
 Markyate Parish Council

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

Environment and Biodiversity
 Ref 18.1 Markyate Parish Council supports the related policies although it does not support new building in the village. The Chiltern beechwoods come close to our parish boundary while the River Ver flows through the village when the springs are up at it's source, Kensworth Lynch, but in the village, the Ver is largely culverted.
 Ref DM33
 Markyate Parish Council supports the policy which seeks to protect and restore chalk streams, particularly the river Ver.
 Flood Risk and Protection
 Ref policy 18.45
 The Parish Council support the drainage assessment/ flood risk assessment (FRA) which requires that developments will not create an increased risk of flooding from surface water and as a minimum show control of runoff rates. storage volumes and sustainable drainage techniques. Markyate is nestled between hills. The Parish Council is well aware of flooding issues, with runoff from the fields spilling into the roads during heavy rain already an existing problem, and welcomes the importance given in relation to any new developments.
 Protection from Environmental Pollution

Ref 18.52 The Parish Council welcomes the Local Plan giving special consideration to the quality of the ground water supplying the chalk aquifer, limiting the effects of noise and air pollution along major routes (i.e. road, rail and aircraft from Luton Airport), the risks associated with Buncefield Oil Terminal and ensuring that development land affected by ground contamination is safe. These issues are of particular local concern and The Parish Council would agree that development should not occur where Noise or Air pollution cannot be limited.

Tree Retention and Protection

Policy DM36 - Tree Retention and Protection Landscaping on Development Sites

Ref 18.66 - Soft planting proposals Ref 18.67 - Space for planting

Policy DM37 tree planting should be suitable and Development landscaping schemes meet long term management requirements

The Parish Council welcomes these tree retention and protection policies including detailed guidance and the long-term management of landscaping schemes. Too often the wrong trees have been planted in the wrong place with no one accepting responsibility for problems which have developed over the years.

Included files

Title	Environment and Biodiversity
ID	EGS12928
Person ID	1269677
Full Name	CAROLINE CLIST
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	We have finite resources (ecological ceiling) in our world and not just in Dacorum. In respect of Theme 2 (Generating a vibrant economy with opportunities for all) we need to consider what 'vibrant' means. If we consider doughnut economics, then we are looking at a social foundation, and not wealth for the few at the expense of the many.
Included files	
Title	Environment and Biodiversity

ID	EGS12993
Person ID	1269778
Full Name	STEPHEN BLADEN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	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.
Included files	
Title	Environment and Biodiversity
ID	EGS13052
Person ID	1270013
Full Name	Mr Daniel Ritchie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.

Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.

<https://www.eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure>

The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.

The plan should also guarantee the following:

- Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices.
- Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted.
- All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator.
- Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.
- Control of polluted waters discharge to non-mains drainage prohibited.
- Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights.
- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree

Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.

- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files

Title Environment and Biodiversity

ID EGS13092

Person ID 1264779

Full Name James Froggatt

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

Planting Trees

Consideration needs to be given to more planting of trees, for instance in supermarket car parks.

The are many dead spaces in Hemel which would benefit from a bit of greenery, For example Maylands Avenue and the St Albans Road up to the motorway and the dead ground next to the Jarman park complex to name three obvious examples.

If one tree is planted for each person housed, this can only be a good thing.

Included files

Title	Environment and Biodiversity
ID	EGS13121
Person ID	1264860
Full Name	Alan Coughtrey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Air Quality The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. Sites should discourage car use, encourage walking and any development should have net zero emissions.
Included files	
Title	Environment and Biodiversity
ID	EGS13137
Person ID	1270061
Full Name	Mrs Coughtrey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Air Quality The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. Sites should discourage car use, encourage walking and any development should have net zero emissions.

Included files	
Title	Environment and Biodiversity
ID	EGS13231
Person ID	1270134
Full Name	Mrs Louise Bladen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	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.
Included files	
Title	Environment and Biodiversity
ID	EGS13469
Person ID	1270266
Full Name	VANDA EMERY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	5) It doesn't matter what you're plan for biodiversity is in this area of that area, unless overall you're going to maintain existing habitats, and create a signifcnat proportion of additional ones, you're not going in the right direction!
Included files	
Title	Environment and Biodiversity
ID	EGS13548
Person ID	1260521
Full Name	Steve Ritchie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.</p> <p>Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.</p> <p>[PLEASE SEE ATTACHED PHOTO - https://www.eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure].</p> <p>The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.</p> <p>The plan should also guarantee the following:</p> <ul style="list-style-type: none"> • Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices. • Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted.

- All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 0 Calculator.
- Air Quality Management Areas (AQMAS) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.
- Control of polluted waters discharge to non-mains drainage prohibited.
- Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights.
- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.
- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files	What is Green Infrastructure - image.jpg
Title	Environment and Biodiversity
ID	EGS13579
Person ID	1227768
Full Name	Ms Denise Young
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<ul style="list-style-type: none"> • Trees and woodland are very valuable to the environment and the community's physical and mental I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.

- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.

Included files

Title Environment and Biodiversity

ID EGS13586

Person ID 1270310

Full Name Ms Eleanor Jelf

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment The River Bulbourne, an internationally important chalk stream, is endangered by over-development on a number of levels but especially with regard to over-extraction of water. These are extremely fragile and valuable habitats and should be fully acknowledged as such. The Chilterns AONB is potentially going to be designated a National Park during the plan period – this should be factored in at this stage. Also, adverse effects on the Chiltern Beechwoods Special Area of Conservation have not been fully considered.

Included files

Title Environment and Biodiversity

ID EGS13660

Person ID 1259288

Full Name Maria de Farago Botella

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

Environment and biodiversity

For this chapter the following points should be taken into account and somehow guaranteed in a prequalification of bidders:

- Guarantee the protection of existing natural environments (natural vegetation and ecosystems) and expansion of natural environment in the areas to be developed by rewilding and connecting in it to areas already protected in the Chilterns (AONB) effectively increasing the area of natural ecosystems as a give back to the community.
- Demand the use of green infrastructure in the developments: green walls, green roofs, wild flower verges, Permeable Pavements, Green Streets and Alleys, Green Parking, green bridges and natural habitats corridors etc...
- All proposals to be assessed first on environmental impact assessment via a prequalification of developers focusing on protecting natural vegetation areas:
 - o Sustainability of ecosystems to protect endemic plants and animals should be part of it.
 - o Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted.
- All major development will be required to deliver an overall net gain in biodiversity of 15% or more, determined by applying the Natural England Biodiversity Metric 2.0 Calculator.
- Air Quality Management Areas (AQMAs) in each H St town in Dacorum to monitor decrease in pollution.
- Polluted waters discharge to non-mains drainage prohibited.
- Lowest light pollution as possible- dim/sensor low voltage lights.
- Tree protection by guaranteeing an Arboricultural Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboricultural Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.
- Landscaping: demand ecological connectivity by integrating planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (> 6years old)
- IMPORTANT: Demand the document with Detailed changes and other corrections to the Green Belt at the Publication Stage of the Local Plan once fully taken into account the results of this public consultation and when Growth Area allocations in the Green Belt are confirmed- prior any development procurement.
- Overall Green, flexible and adjustable plan. Plan says that sites removed from the Green Belt will be managed as countryside until required for development- why not release the land as needed in phases: split in phases allows to change strategy if house demand decrease? So more green belt land is protected?-
- If villages have to be developed then reclaim land for rewilding- demand larger natural forested area.
- Prioritise always redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings).

Included files

Title	Environment and Biodiversity
ID	EGS13665
Person ID	1207133
Full Name	Chilterns Conservation Board
Organisation Details	Chilterns Conservation Board
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Background and summary</p> <p>This section comments on the draft local plan as a whole.</p> <p>The Chilterns Conservation Board (CCB) is grateful to Dacorum Borough Council's (DBC) officers and members for the seriousness with which they have approached the conservation and enhancement of the natural beauty of the Chilterns Area of Outstanding Natural Beauty (AONB). The CCB has been engaged as if it was a specific consultation body (or statutory consultee), which is an approach that is most welcome and could usefully be emulated by other LPAs.</p> <p>Dacorum Borough covers a relatively small area of the AONB in comparison with some other districts, and the AONB covers a significant minority of borough's area. Nonetheless, the shape of the borough boundary is such that it has a much wider influence on the AONB and its setting. Furthermore, much more of the borough's landscape is of a sufficiently high and undamaged character, sharing many of the characteristics of the AONB, that it could be designated as part of the AONB, or even as part of a National Park anticipated in the Landscapes Review (the "Glover Report").</p> <p>The borough also includes or adjoins some of the most attractive, popular and sensitive of the Chilterns' assets, including the Chilterns Beechwoods SAC at Ashridge and Tring Park, the Grand Union Canal, and three of the area's nine ecologically unique chalk streams (the Ver, Gade and Bulbourne) and the catchment of a fourth (the Chess).</p> <p>Support for the principle of the local plan's approach to the Chilterns</p> <p>The CCB's officers have taken a cautiously positive approach to the development of the draft Local Plan. In particular, as will be developed in our detailed responses to the plan's proposals below, we particularly welcome:</p> <ul style="list-style-type: none"> • The (implicit) direction of growth to areas outside of the designated AONB. • The inclusion, and enhancement, of the CCB's "model policy" as part of policy DM27. • The frequent (but not comprehensive) references to the AONB in general, and in particular to compliance with the Chilterns AONB Management Plan 2019-24, the Chilterns Buildings Design Guide and other CCB position statements and technical advice. • The attention paid to air and water quality, and particularly to the protection and enhancement of the area's chalk streams.

- The attention paid in principle to the sensitivity of the Chilterns Beechwoods Special Area of Conservation. Specific support will be expressed below in relation to relevant policies and proposals.

Included files

Title Environment and Biodiversity

ID EGS13680

Person ID 1207133

Full Name Chilterns Conservation Board

Organisation Details Chilterns Conservation Board

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

Paragraph 18.12 Chilterns Conservation Board Comment.

The CCB is grateful for being namechecked, and having our role explained in the draft local plan. We welcome the references to our published policy and guidance materials, and would be very happy for the council to provide a link to those materials on our website. We would also be grateful if the plan could specify that the CCB’s management plan, design guide, position statements and technical advice notes would be taken as material considerations that the council will normally take into account when considering development proposals in the Chilterns AONB and its setting.

DM27 Landscape Character and the Chilterns AONB Support.

The CCB strongly supports the inclusion of this policy in Dacorum’s draft local plan. We note that the policy includes all of the text from CCB’s model local plan policy, with some additions that we consider to be enhancements of the original. (Note that there is currently a typographical error in clause 4(b) where “affects” should be “affect”.) If the council considers making changes to this policy, we would very much hope to be consulted.

DM28 Protection of Sites Object.

The CCB supports the principle of the policy.

We do, however, strongly object to the wording of clause 2, which is not consistent with the concept of the mitigation hierarchy that it seeks to apply. The first – and most valuable – step in the mitigation hierarchy is avoidance of harm in

the first place. Discussing the mitigation hierarchy under a sub- clause dealing with “compensatory provision” is risible, since compensation is the last resort of the mitigation hierarchy. Indeed, compensation cannot, by definition, “ensure that the overall coherence of the site is protected”, but only aim to replace (i.e. compensate for) the harm that the proposed development will cause. This clause needs revisiting, but the rest of the policy is sound.

In particular we note that clauses 3(a)(ii) and 3(b)(ii) require that before development likely to cause harm to sites of national or international importance the council will satisfy itself that “there are no suitable alternatives to the proposal”. With regard to the internationally important Chiltern Beechwoods SAC at Ashridge and Tring Park, for example, we do not consider that the council has properly considered “suitable alternatives”, including the alternatives of either (a) locating significant development proposals further away from the sites, or (b) applying restraint regarding the quantum of development, as is allowed for under paragraph 11(b) of the NPPF.

DM30 Biodiversity Net Gain

Comment.

As with policy DM26, the CCB would be interested in exploring ways in which offsite biodiversity net gain contributions might be coordinated with other aspirations for nature recovery, rewilding, etc in a strategic way across the Chilterns region (not just within the AONB), including in partnership with others.

DM31 Chiltern Beechwoods SAC

Object.

The CCB is grateful to the council’s officers for engaging with us on the policies and proposals supporting the protection and enhancement of the Chiltern Beechwood SAC sites at Ashridge and Tring Park. We welcome the seriousness with which the issue is being approached, and support the principle and objectives behind this policy. As noted elsewhere in our submissions, we are not yet convinced that the level of development proposed overall in Dacorum Borough and the specific sites selected for development are necessarily consistent with the protection and enhancement of the SAC (or indeed the Chilterns AONB landscape as a whole), and this concern applies to development proposals around the north of Hemel Hempstead, in Berkhamsted and, particularly, to the eastern and south-eastern expansion of Tring.

The focus in much of the plan, including policy DM31, is on mitigating or compensating for the impacts of these developments on the SAC, rather than avoiding the harm arising in the first place. As noted in our commentary on the plan’s strategic policies, particularly the housing strategy, the quantum of development for the whole Borough has been taken as a given and not challenged, despite the evident general sensitivity of the Borough’s environment having been recognised in the plan’s context in section 2, including the presence of the SAC sites, the Chilterns AONB, rare chalk streams, etc.

This policy continues to focus on mitigation (with avoidance of harm only considered in terms of the development taking place) and this framework is not considered to provide sufficient protection for the SAC in terms of setting out what evidence is required to justify the assumption that there is need for development sufficient to over-ride the general presumption against causing harm to these sites. There is not even the application of the precautionary principle.

Note, the policy maintains that the SACs and their zones of influence are shown on the “policies map”, but neither area is included on the draft “proposals map” that accompanied this consultation.

The CCB welcomes the continuing opportunity to engage with Dacorum Borough Council in developing an appropriate planning policy context for the protection and enhancement of the SACs.

DM32 Ashridge Estate

Comment.

The CCB supports policy DM32, but considers that the Chilterns Buildings Design Guide should be referenced as supporting guidance.

DM33 River Character and the Water Environment

Comment.

The CCB supports policy DM33 as it stands. CCB officers have been having internal conversations about developing model local plan policies for the protection and enhancement of chalk streams, although this work is at very early stages. We would very much welcome the opportunity to develop this policy area with the council's officers as the plan goes forwards.

DM35 Environmental Pollution

Support, with comment.

The CCB supports this policy (really a set of policies). We would ideally seek stronger protections in the Chilterns AONB area and its setting, especially for preventing light pollution, but have not been able to identify a practicable improvement to the wording, without completely changing the policy. We would welcome inclusion of the Chilterns Buildings Design Guide and reference to our technical advice notes in the supporting guidance.

DM36 Tree protection

Object.

The CCB strongly supports the principle of this policy, but we have two concerns.

First, the requirement under clause 1 for all development to “incorporate” at least 2 trees per dwelling could have the unintended consequence of preventing higher density development or the sensitive redevelopment/conversion of existing buildings. It may be appropriate to apply this aspect of the policy only in certain circumstances, or to allow for offsite or other forms of provision, similar to the carbon offsetting (DM26) or biodiversity net gain (DM30) policies. (Would the trees required under DM36 be in addition to any required under those policies?) The policy could also usefully require appropriate native species (as is required under DM37 – landscaping).

DM37 Landscaping

Comment.

The policy could usefully refer to the Chilterns Buildings Design Guide as part of the supporting guidance.

Included files

Title	Environment and Biodiversity
ID	EGS13688
Person ID	1207133

Full Name	Chilterns Conservation Board
Organisation Details	Chilterns Conservation Board
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Appendix 1: About Us</p> <p>The Chilterns Area of Outstanding Natural Beauty</p> <p>The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.</p> <p>Chilterns Conservation Board</p> <p>The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>The Board has two statutory purposes under section 87 of the CRoW Act:</p> <p>a) To conserve and enhance the natural beauty of the AONB; and</p> <p>b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.</p> <p>In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.</p> <p>Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under “General duty of public bodies etc”</p> <p>“(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”</p> <p>List of Organisations providing Nominees to the Chilterns AONB Conservation Board</p> <p>The Chilterns Conservation Board has 27 board members, all drawn from local communities; these are elected by:</p> <ul style="list-style-type: none"> • Hertfordshire and Oxfordshire County Councils • Buckinghamshire, Central Bedfordshire and Luton Borough Councils (unitary authorities) • Dacorum Borough and North Hertfordshire, South Oxfordshire and Three Rivers District Councils • The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and

The Secretary of State for the Environment, Food and Rural Affairs (8 in total).

Included files

Title Environment and Biodiversity

ID EGS13712

Person ID 1263002

Full Name Rhona Denness

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

Environment and Biodiversity.

We are in a climate emergency and this should be the highest context for any developments or growth plan.

The plan however gives little detail about the potential impact of developments on biodiversity and overall environment. It also does not commit to any detailed strategies for enhancing and protecting biodiversity and historic environments. The plan would create irreversible harm to Green Belt land and AONB within Tring with the cumulative effect of all of the building, population increase, roads and traffic alongside the land loss compounding this threat. Community human health is also at risk with the loss of green spaces, increased pollution and taking away from attractive and historic environment.

Opportunities for nature conservation should be found, ahead of any development.

Government policy gives a responsibility to councils to show why there are exceptional circumstances for using Green Belt land for developments. As above, I do not believe the council has shown evidence for the huge increase in homes in Dacorum overall, and particularly the disproportionate number of these in Tring.

Whatever evidence might show of housing need, the council hasn't shown evidence that brownfield land and/or land that is not within the Green Belt in Tring has been assessed to meet any housing requirement. It also hasn't shown the Duty to Cooperate of consulting with other adjacent Local Planning Authorities in relation to this local plan. Irrespective of the housing requirement it hasn't therefore identified exceptional circumstances to justify the use of Green Belt land.

Tring is bounded on two sides by Buckinghamshire. Their plans will impact hugely on employment, traffic, local land use within and across boundaries. The council have said they will need to demonstrate they have satisfied the Duty to

Cooperate *by the time* the LocalPlan is submitted for examination. This shows that the council is not using the Duty to Cooperate to *inform* their planning strategy along with cross boundary councils, rather seeing it as a tick list exercise after the event.

The plans for building in Tring are not compatible with protecting and enhancing the distinctive landscape, open land, biological and geological diversity in Tring. They would destroy the natural landscape in different parts of the town, including Green Belt and land surrounded by the Chilterns AONB.

The areas of Tr01, Tr02, Tr03 p are of important value for for wildlife and biodiversity as well as important sites for human recreation and wellbeing. Particularly in the current Climate Emergency, and global threats to biodiversity these important areas should be preserved for current and future generations. The plans appear to confuse and conflate new sports and leisure open spaces with open countryside and wildlife corridors. The loss of the latter cannot be mitigated against with the former. Wherever possible wildlife corridors, ancient hedgerows and trees should be preserved and enhanced.

Building a major road junction on Cow Lane and two new major road junctions on the London Road in Tring will cause serious environmental harm to wildlife and humans through pollution, noise, and congestion. Potentially building a road across an important wildlife corridor (Marshcroft Lane) will undoubtedly cause destruction of wildlife habitats and biodiversity.

The plan mentions the risk to Ashridge estate SSSI and Stubbings Wood of increased population and visitor numbers but gives inadequate assessment of these. I believe that the impact of local traffic increase, pollution and visitor numbers would have a very negative impact on these sites and that of Tring Park SSSI. The impact of these should be considered alongside housing need. Government policy seems clear that councils have responsibilities for assessing housing need alongside local environmental concerns rather than the former trumping the latter.

I concur with the need for a network of cycle paths and would have liked to see more detail of proposals for these. They need to be well connected and integrated into any new development. Lighting should be at a low level to minimise effects on birds, insects and mammals.

Included files	
Title	Environment and Biodiversity
ID	EGS13738
Person ID	1270365
Full Name	Trustees of Gaddesden Estate
Organisation Details	Trustees of Gaddesden Estate (GaddesdenTrust)
Agent ID	1270367
Agent Name	Mr David Fletcher

Agent Organisation	Director – National Development & Planning Strutt and Parker
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>In section 18.32 of the EGS, the Council own assessment indicates that the likely significant effects from the urbanising impact of the planned growth cannot be ruled out. This includes the significant amount of visitor pressure on recreational area such as Ashridge Commons and Woods SSSI which are highly sensitive This is acknowledged in the point 1 of the section which states that “...<i>Ashridge Estate and Tring Woodlands SSSI offer unique feature which cannot be easily replicated elsewhere</i>”. It is therefore that the EGS needs to strike the balanced between meeting the housing demands for Dacorum whilst protecting the most sensitive parts of Dacorum. Therefore, it is not clear why the Council is proposing its largest allocation in close proximity to the AONB and Ashridge Commons and Woods SSSI, when there are clearly more appropriate alternative options to the south of the Borough.</p> <p>At a minimum a detailed assessment needs to be undertaken of visitor pressure upon the AONB and SAC/SSSI, with a clear mitigation strategy proposed to offset the adverse impacts of a development of this size and scale.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS13758
Person ID	1270372
Full Name	Janet Tuppen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	10. Chilterns AONB. Consideration has been given to direct impact on the AONB, but indirect and culmulative impact is ignored. The LPA is obliged to take into account the Chilterns AONB Management Plan. This indicates that Government policy confirms that the presence of AONBs can restrict development in order to help achieve sustainable development and that “the scale and extent of development within these designated areas should be limited”

10.1 From p. 73: *“Cumulative impact of development: A single planning proposal may affect only a small area of the AONB. However, a number of similar developments in the area, incremental changes over time, or a series of new developments in sequential views along an important trail, can have a significant cumulative impact. The character of the AONB, its wildlife and people’s enjoyment could slowly diminish over time. We have further advice in our Position Statement on the Cumulative Impacts of Development on the Chilterns AONB.”*

10.2 And p.76: *“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)”*

11. Landscape Character Assessment. These reports need to be given greater weight in the planning process, for areas like the valley floor, for example:

11.1 **Area 118: Lower Bulbourne Valley** (from 2004 assessment):

The evaluation shows that the condition & strength of character are both *Moderate* – the requirements are to ‘Improve and Conserve’

Some recommendations include:

- *develop a strategy to limit built development within the area and mitigate the impact of existing development either within or adjacent to the area on the edges of Berkhamsted and Hemel Hempstead*
- ***conserve unimproved and semi-improved meadows within the valley floor*** and by avoiding agricultural improvements in order to maintain their nature conservation value. *Encourage traditional management by grazing and the maintenance of smaller scale hedged field units*
- *encourage the management and enhancement of existing wetland features within the valley floor environment, to re-create lost features and seek opportunities to create new features. To balance the recreational uses with the ecological value and to encourage a strategy to improve the water quality and quantity*

12. Biodiversity and the environment need to be given more prominence. The sheer variety of life forms on the planet have their own intrinsic value, but they are also important to us – the health of the human race depends on the overall health of the planet. But there is another important factor to take into account – the economic importance of biodiversity.

- The latest report by Professor Sir Partha Dasgupta, states that economics need to take into account the depletion of natural resources. Boris Johnson said “I welcome the review...protecting and enhancing nature needs more than good intentions – it requires concerted, co-ordinated action.” A review of the report can be read here: <https://www.theguardian.com/environment/2021/feb/02/economics-of-biodiversity-review-what-are-the-recommendations>

- **This Local Plan does not put the environment or biodiversity at its core.** The Landscape Character Assessments look at a number of characterisations, but biodiversity is not one of them. When plots of land have been assessed by ARUP and others, they do not take into account the existing species diversity or the importance of each individual plot of land on the ability of wildlife to survive, and to thrive. Wildlife needs connected habitats to be able to maintain a diverse gene pool, able to withstand the multiple threats placed upon it today. (see Climate Change). Berkhamsted is already a densely built environment, with few planned green spaces within the town itself. There is little space for wildlife to thrive. The existing wildlife corridors are the canal and River Bulbourne, the railway line, and allotment plots are also important. The development of infill sites needs to take into account their position relative to these corridors.
- The small plots at Lock Field and Bank Mill Lane are more environmentally sensitive than they appear from the LCA as it doesn't take into account biodiversity. These small sites are riparian meadows, they are both full of birdlife, and are important for overwintering and summer migratory species as well as resident species.
- The Environment and biodiversity documents are older than the other studies – they appear to be an afterthought in this process. The most recent is from 2011, and the the Urban Nature conservation study is from 2006.
- In the previous Spatial Strategy for Berkhamsted, 'Looking after the environment' was one of the core objectives. This has been lost from this new plan.

13. **Habitat sensitivity.** The River Bulbourne is an environmentally sensitive and internationally important Chalk Stream. The Urban Nature Conservation study states that *“The quality of the river corridors through the town affects the wildlife resources both upstream and downstream of the town, and emphasis should be placed on enhancing their natural chalk stream characteristics.*

In the longer term it is essential that the existing corridors and wedges are secured and not truncated by inappropriate development. Links to open countryside and the nature of the townscape edges are also important. Their protection is vital when considering the form of any new development requirements.” This is not being taken into account at Bank Mill Lane.

14. **Green Belt.** The release of Green Belt land is supposed to be a last resort, as indicated in the NPPF “where exceptional circumstances are fully evidenced and justified.” It has been made clear that DBC is not prioritising Brown Field sites, therefore the release of the amount of green belt suggested in this proposal has not been fully evidenced or justified.

Included files

Title Environment and Biodiversity

ID EGS13796

Person ID

Full Name	
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>? Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.</p> <p>? An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS13817
Person ID	1270385
Full Name	Ms Katy Regan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Water</p> <p>The plan acknowledges that our local water resources are under extreme pressure, from the use of ground water for water supply and from climate change. The Chalk streams in Dacorum are Globally rare, and already carry an unacceptable burden.</p>

In 2019 the River Gade ran dry. In November 2019 the Council passed a motion to prevent further decline of our chalk streams, and ensure that our Local Plan will do all that is possible to protect these important ecosystems. This is not recognized in the Local Plan.

Policy DM33 of the Local Plan states the following objective:

- 1 c) avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments.

However, the plan proposes an increase in our population of up to 28% (probably at least 20%), which indicates a likely increase in water requirements by a similar amount. Without a credible plan to indicate how the additional water for this increase in housing will be provided, as well as additional requirements for offices, shops and factories then this need will have been created, not avoided.

The details on the proposed sites for development do not provide any information on the potential negative impacts on our chalk streams, and the mitigation measures of potential adverse effects on our water resources are stated as incomplete (they are acknowledged only to 'help' mitigate the impact). Therefore the plan includes an implicit negative impact on our chalk streams which it acknowledges will not be fully mitigated.

There is no credible plan to avoid extraction of water from the ground, and thus policy DM33, whilst indicating the correct intentions, fails in its stated objectives.

Sewage capacity is already inadequate, and it is not clear from the plan how this will be rectified.

Biodiversity

There is a 10% net biodiversity national requirement, which will soon become mandatory. To meet the spirit of this requirement as well as the legal obligations, any building and resultant changes to the environment, be that infrastructure, housing, commercial property or agriculture, will need to be calculated in terms of the change in the underlying biodiversity value, and a 10% net gain provided. It should be a requirement that an assessment of biodiversity value change be included and published as part of planning proposals, and verified by an independent third party.

Included files

Title	Environment and Biodiversity
ID	EGS13897
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Environment and Biodiversity</p> <p>New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.</p> <p>Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See the image from the European Environment Agency supplied in the Appendix.</p> <p>The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.</p> <p>(See extra 2 sheets of answers supplied, starting 'The plan should also guarantee the following:.....')</p> <p>The plan should also guarantee the following:</p> <ul style="list-style-type: none"> • Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices. • Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted. • All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator. • Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution. • Control of polluted waters discharge to non-mains drainage prohibited. • Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights.

- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.
- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files

[Kathryn Salway appendix \(images\) to Questions 3 and 6.pdf](#)

Title

Environment and Biodiversity

ID

EGS13913

Person ID

1207810

Full Name

Louisa Groves

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment

Environment - it should not just be key landscapes that should have a framework to keep them safe it should be ALL green belt and green areas in Dacorum. Do not take these away. They are key to the mental health of residents.

Included files

Title

Environment and Biodiversity

ID

EGS13983

Person ID

1270411

Full Name

Ms Jacqui Parr

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> • Trees and woodland are very valuable to the environment and the community's physical and mental I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area. • An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.
Included files	
Title	Environment and Biodiversity
ID	EGS14107
Person ID	1270501
Full Name	DAVID WHITE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	The Guiding Development policies put the need to meet housing targets above considerations such as climate change, sustainability, biodiversity and the need to promote public health. The Green Belt plays a key role in protecting the environment whilst overcrowding, traffic congestion and pollution harms people's physical and mental wellbeing.
Included files	
Title	Environment and Biodiversity

ID	EGS14163
Person ID	1163439
Full Name	Lindy Weinreb
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	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
Included files	
Title	Environment and Biodiversity
ID	EGS14189
Person ID	1253654
Full Name	Jodie Bell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.</p> <p>Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.</p>

The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.

Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets.

Included files

Title Environment and Biodiversity

ID EGS14256

Person ID 1152075

Full Name Rob Wakely

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.

Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.

<https://www.eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure>

The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity. Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.

The plan should also guarantee the following:

- Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate
- Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be
- All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 0 Calculator.
- Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution.
- Control of polluted waters discharge to non-mains drainage
- Developments must be designed to ensure the lowest possible light pollution and utilise low energy
- Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree

Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained

- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files

[14256.jpg](#)

Title

Environment and Biodiversity

ID

EGS14367

Person ID

1270640

Full Name

Geoffrey Llewellyn

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

Yes

* Yes

* No

Environment and Biodiversity comment

The lack of water supply without further illegal abstraction from our unique chalk streams renders all DCB's policy statements about the environment and biodiversity meaningless and vacuous.

Included files

Title

Environment and Biodiversity

ID

EGS14494

Person ID

1270679

Full Name	GLENNEDEN PLANT SALES LTD
Organisation Details	
Agent ID	1270678
Agent Name	MR WILLIAM LLOYD
Agent Organisation	DLP PLANNING LTD
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Draft Policy DM27 – Landscape Character and Chilterns Area of Outstanding Natural Beauty</p> <p>The draft Policy as set out is largely acceptable. However, there is no guidance provided on how development on brownfield land will be treated, as such schemes will have significantly different impacts than those on undeveloped sites. The development proposals are likely to have a lesser impact on the AONB. This important factor is not explored in the policy text and could be a crucial aspect of suitable development, with lesser overall potential impacts, being able to come forward in these locations.</p> <p>Furthermore, the draft Policy does not provide guidance on sites that are located outside the boundary of the AONB or in close proximity. Whilst there is an inherent requirement to still be sensitive to the nearby designation, the overall weight of the policy and how it is enforced will be altered. This needs to be reflected within the draft Policy to ensure that development is not being overly restricted in locations which are suitable for sustainable development.</p> <p>Draft Policy DM30 – Biodiversity Net Gain</p> <p>The draft Policy states that a requirement for a 10% net gain in biodiversity for all developments. Whilst the direction of travel on biodiversity within the UK, is towards a 10% net gain for all development, this Bill has not as yet been passed into legislation. The current guidance in the NPPF in Section 15 (Conserving and enhancing the natural environment) sets out that a net gain has to be achieved and not a 10% net gain. Therefore, under the current guidance, this draft policy requirement appears to be overly onerous on development.</p> <p>Also, we request that the draft Policy is amended to include reference to the viability of development, in particular those schemes which include both off-site and on-site mitigation measures. This should enable development to be more achievable and to be better addressed on a case-by-case basis.</p> <p>The off-site compensation sites should be listed as part of the draft Policy for the sake of transparency and to establish where the funds are likely to be spent.</p>
Included files	
Title	Environment and Biodiversity

ID	EGS14549
Person ID	1270698
Full Name	Ms Elizabeth Hamilton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>The Chilterns Area of Outstanding Natural Beauty (AONB)</p> <p>The one third of the countryside area in Dacorum Borough which is within the Chilterns AONB 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 (including traffic entering the AONB) and pollution.</p> <p>The current consultation on revisions to the NPPF includes a proposed revision to paragraph 172 (becoming new paragraph 175). This will be a very significant factor to be taken into account in this Strategy. The proposed new wording extending the final sentence states: ‘while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscapes’.</p> <p>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.</p>

The Strategy also proposes that substantial areas of the Green Belt around Hemel Hempstead, Berkhamsted and Tring alongside the AONB boundary should be allocated for housing.

Instead of welcoming and celebrating the additional resources which National Park status would bring to the Chilterns, which would contribute to the protection of the landscape and provide a boost to the local visitor economy, the Strategy is instead making proposals which will impair the special qualities of the AONB.

Included files

Title Environment and Biodiversity

ID EGS14551

Person ID 1270698

Full Name Ms Elizabeth Hamilton

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Environment and Biodiversity comment Policy DM35 concerning various forms of pollution fails to reference the setting of the Chilterns AONB as well as the area within it.

Included files

Title Environment and Biodiversity

ID EGS14554

Person ID 1270698

Full Name Ms Elizabeth Hamilton

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>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.</p> <p>Despite chalk rivers being a priority habitat under s 41 of the Natural Environment and Rural Communities Act 2006, the Strategy is largely silent on the matter of protecting the three designated chalk streams in the Borough area, namely the Bulbourne, the Gade and the Ver.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS14557
Person ID	1270698
Full Name	Ms Elizabeth Hamilton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	Figure 8, para 18.17 and Policy DM28 make no mention of chalk rivers, nor do paras. 18.20 to 22 and Policy DM29, which specifically relate to protected species and habitats, including s 41 sites.

Para 18.41 makes no mention of the Environment Agency's (EA's) requirement that reductions in abstractions from the headwaters of chalk rivers must be in place by 2025, as required by the EA's Water Industry National Environment Programme (WINEP).

Policy DM33 however states: The water environment will be managed through development management and other action in consultation with the Environment Agency and the Lead Local Flood Authority to achieve the following objectives:

c: avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments.

Most of the Dacorum Borough area lies within the catchments of these three rivers, apart from a small section in the south which is in the Chess catchment (another chalk river) and the area beyond Tring which is in the River Thames catchment.

The effect of this will be to stop abstracting water from the ground as required by the Environment Agency.

The reductions in groundwater abstractions required by the EA will be made possible when a new water supply from Affinity Water's allocation from Graffham Water becomes available, which is due in 2024/25. The new Graffham allocation will equal the groundwater reductions so will not provide additional water to the public water supply. Thereafter no new imported supplies of water are likely to be possible before 2030 at the earliest. The Water Resources South East (WRSE) process now underway aims to identify new water sources, including new reservoirs and transfers of water from elsewhere in England. A decision on which option(s) to choose is expected in 2025. Thereafter a minimum of six years will be needed before the new supplies are delivered (and much longer if the reservoir options are chosen). In the intervening period leakage reductions, reductions in per capita water use and rainwater saving options will be the only means available to boost available water supplies.

It is unthinkable yet a definite possibility that the level of growth proposed, not just in Dacorum but in adjoining areas, will lead to water shortages especially in periods of lower than average rainfall which are becoming more common (the last two periods were Spring 2020 and the winter, spring and summer of 2018/19). If this happens there will be no option but to increase groundwater abstractions again.

Dacorum Borough Council 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 of the SAC within Dacorum comprises the National

Trust's Ashridge Estate, a popular leisure and recreation destination. The housing numbers proposed in the Strategy are such that the increase in population of the Dacorum Borough area will undoubtedly put even greater pressure on the SAC area, which is already suffering damage to its environment due to traffic and car parking, dog fouling, and wear and tear on paths and tracks.

At the time of publishing the Strategy Dacorum Borough Council was in the process of engaging consultants to carry out the Screening exercise which defines whether any proposals contained in the Strategy are considered likely to have any adverse effects on the SAC, the first stage in the Habitats Regulations Assessment (HRA) process applicable to this area. It is irresponsible of Dacorum Borough Council to publish this Strategy without first carrying out at least the Screening exercise.

The Screening must not take into account or assess any potential mitigation, as determined by 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.

The introductory paragraphs to Chapter 18 set out the national policy framework on biodiversity. However, apart from policies on the Chilterns AONB, protected sites and species, biodiversity net gain associated with development, the protection of trees and woodlands associated with development, and policies on Open Land (by definition lying within larger settlements) there is no other up-to-date strategic framework outlined for the conservation and in particular the enhancement of the Borough's biodiversity. The two documents referred to as forming a basis for policy are both out-of-date and do not reflect the urgency of the biodiversity crisis, or the scope for enlargement of biodiversity assets, including rewilding, reflected in modern conservation action. The Hertfordshire Biodiversity Action Plan dates from 2006. The Dacorum Borough Green Infrastructure Plan (2011), listed in the evidence base as the Green Space Strategy (2011), is focussed on existing sites and is very urban-centric, with little ambition for establishing larger scale sites devoted to biodiversity enhancement. A third document is also referenced: however the Dacorum Borough Council Trees and Woodlands Policy (2015) relates only to trees for which the Borough Council owns or has direct responsibility for and is not listed in the evidence base.

'Shaping the future of Dacorum', Dacorum's Growth and Infrastructure Strategy to 2050, makes no mention of the critical issues around water supply or those relating to wastewater and sewerage infrastructure.

In 2019 the Environment Agency’s Challenges and Choices Consultation set out options and priorities for the future of the water environment, for public consultation. The *Pollution from Water Industry Wastewater* challenge document says that ‘more extreme weather, increasing urbanisation and population growth means that protecting the current state of the environment is likely to prove as difficult as improving it’.

Figures released by the Environment Agency on 17th September 2020 (reported at deframedia.blog.gov.uk on 18th September 2020), and widely reported in the press, show that there has been no progress between 2016 and 2019 towards meeting the target for at least three quarters of water bodies in England meeting good ecological status. With only 16% rated as good, including only 14% of rivers, this is one of the worst records in Europe and compares with a European average of 40%. The situation remains unchanged from 2016. In addition, admittedly with higher testing standards, no water bodies achieved good chemical status. The Agency also admitted at this time that storm overflows spilled sewage into rivers on more than 200,000 occasions in 2019 (this is for England).

The single reference to wastewater in the NPPF simply states that strategic policies should ‘make sufficient provision for’ infrastructure in a number of areas including wastewater (para 20) although the footnote clarifies that this must be done in line with the presumption in favour of sustainable development (para 11).

The 2010 Water Cycle Study Scoping Study (referred to under **Chalk rivers** above) showed that a number of upgrades to existing wastewater treatment works (WwTWs) serving the areas covered by the Study would be required given the then growth proposals. A key concern noted was that throughout most of the East of England the majority of receiving watercourses already exhibited high phosphate levels which caused them to be below good ecological status. Further discharges would therefore require substantial reductions in phosphate levels which might be technologically and financially challenging. Objections from Natural England to levels of nitrate pollution have recently stalled development plans around the Solent and there may be similar issues for other local planning authorities.

Included files

Title Environment and Biodiversity

ID EGS14568

Person ID 1270700

Full Name Mr Peter Sims

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<ul style="list-style-type: none"> It doesn't matter what you're plan for biodiversity is in this area of that area, unless overall you're going to maintain existing habitats, and create a signifcnat proportion of additional ones, you're not going in the right direction!
Included files	
Title	Environment and Biodiversity
ID	EGS14594
Person ID	1270707
Full Name	Ms Debbie Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.</p> <p>An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.</p> <p>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.</p>

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)

Included files

Title Environment and Biodiversity

ID EGS14664

Person ID 860814

Full Name Mrs Clare Joyce

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment

- Environment & Biodiversity: It is not clear in this document how the substantial loss of Green Belt is going to be offset - this needs to be proactively detailed. Dacorum should impose the highest environmental standards for all new builds. It should not be optional for developers to maintain hedgerows and severe and punitive penalties (not just a financial cost easily absorbed by sales of executive housing) for their destruction should be applied. Any development at Tring Fields for example should be restricted to existing field boundaries with smaller discrete settlements. Rather than just planting trees, Dacorum should be bolder and visionary with its plan, encouraging greater biodiversity and planning wildlife

Included files

Title Environment and Biodiversity

ID EGS14677

Person ID 1270738

Full Name JOHN BELL

Organisation Details SECRETARY

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>As a town situated in a valley, air pollution is a significant issue which must be taken into consideration in a revised Local Plan.</p> <ul style="list-style-type: none"> 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 Berkhamsted lies along a valley, with most residential areas along the bottom and up the sides. Air pollution naturally collects in this area. The current Local Plan uses 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
Included files	
Title	Environment and Biodiversity
ID	EGS14756
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 * No	
Environment and Biodiversity comment	1 Where there are grounds to believe is evidence that demonstrates that the SAC will be affected by proposed development, applicants must establish the extent of potential This evidence should inform appropriately designed

plans and mitigation measures. Proposals must demonstrate that any effects of development would not be adverse to the integrity of the SAC.

1 Open Space Requirements and Mitigation for Recreational Impacts

*1 Allocated Growth Areas or Major residential development - In order to mitigate against the ~~potential~~ or identified adverse effects of additional development on Dacorum, ~~all~~ development that would result in a net increase in homes within the Borough **and give rise to adverse impacts as identified**, will be required to:*

*1 Point of destination: assist in the conservation and enhancement of the biodiversity, character and appearance and landscape setting of the Chilterns Beechwoods SAC by making financial contributions **(based on the level of impact)** towards the Chilterns Beechwoods On-site and Access Management Strategy Scheme (to be produced), or any subsequent scheme which replaces this. Details will be set out in the Chilterns Beechwoods SAC SPD; and*

2 Point of Origin: demonstrate that adequate measures are put in place to avoid or mitigate any potential increase in visitor pressure on the This will require the provision of bespoke on-site mitigation to form part of the proposed development. Such provision will need to be:

- A -delivered 'up front' to reduce pressures placed upon the SAC;*
- B -determined in **consultation agreement** with Natural England and the National Trust; and*

*3 C - be proportionately addressed in accordance with the mitigation hierarchy **and the level of identified impact** (mitigation -offsetting within the locality - compensation in the form of habitat)*

1 Points iii (A. - D). must include a strategy demonstrating how they deliver for both residents and tourists:

1 sufficient open space proposals, and where relevant

2 options for Suitable Alternative Natural Greenspace of an appropriate quality and in the right place

It is understood that discussions with Natural England are on-going and a Habitats Regulations Assessment (HRA) has been commissioned to identify any potential impacts on the Chiltern Beechwoods SAC as a result of DBC's planned growth. The effects and any associated requirements therefore remain undetermined at this stage.

However, as set out within the our supporting Planning Response, existing evidence does not suggest that visitor pressure on the SAC or harmful emissions from traffic flows are currently, or in the future, likely to adversely affect the conservation objectives or integrity of the nature conservation designation. In addition, a number of the strategic allocations such as those at Berkhamsted will provide high-quality open spaces and enhanced connections into the wider green infrastructure network as per the site specific requirements. As such, a substantial proportion of potential recreational pressure would be exerted on-site and in the immediate vicinity.

This policy should not be pre-empting technical conclusions before they are known and in accordance with the NPPF should only be seeking such measures of mitigation where it has been demonstrated that this will be necessary to make the development acceptable and off-set any identified adverse effects. Not a blanket requirement across all development as currently worded. A number of amendments are therefore required at this stage and it is recommended that a wholesale review of this policy is undertaken once the HRA has been completed to ensure it is justified when considered against the NPPF tests of soundness.

Included files

Title Environment and Biodiversity

ID EGS14757

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

Environment and Biodiversity comment

*Developers will be expected to protect and retain existing trees and hedgerows as part of development proposals, and to replace them where their loss is justified. All development will be expected to **maximise the opportunities for the planting of incorporate two or more new trees per dwelling or per 100 sq m floor space (for non-residential developments) on-site in seeking to deliver environmental gains.** Where a tree is lost through development **it must be replaced with at least three new 'like for like' provision or a species of equivalent or better quality trees must be provided.***

Taylor Wimpey's aspiration for Land at South Berkhamsted is to create a green infrastructure/landscape-led development and the principle of new tree planting is supported. It may well be that such large scale developments can achieve and even exceed the proposed requirement of 2+ new trees per dwellings or 100sqm of non-residential floorspace. However, it is a level of detail that will not be known for certain until the detailed design/masterplanning stages. Therefore, as a blanket policy requirement it seems arbitrary and should be based on detailed impact considerations to include existing tree coverage; site location and suitability; within the context of site constraints; and balanced alongside the delivery of other identified infrastructure items.

It is therefore recommended that emphasis is instead placed on encouraging the maximisation of opportunities for new tree planting as part of strategic developments and this would ensure the policy can be considered to be justified in satisfying the tests of soundness

Included files

Title Environment and Biodiversity

ID EGS14759

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**

Environment and Biodiversity comment 5.0 Policy DM30 Biodiversity Net Gain follows national guidance and requires a 10% net gain to be achieved, determined by applying the Natural England Biodiversity Metric 2.0 Calculator. Reference to any relevant successor calculator may be sensible.

5.1 Policy DM36 states “All development will be expected to incorporate two or more new trees per dwelling or per 100sqm floor space on-site. Where a tree is lost through development at least three new ‘like for like’ trees must be provided.” This is overly prescriptive and does not allow for a positive landscape scheme which reflects the site context.

Included files

Title Environment and Biodiversity

ID EGS14792

Person ID 1270796

Full Name LUCINDA ROBINSON

Organisation Details The Marine Management Organisation (MMO)

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Consultation response - PLEASE READ</p> <p>Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p> <p>Kind regards, The Marine Management Organisation</p> <p>Response to your consultation</p> <p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.</p> <p>Marine Licensing</p> <p>Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that would affect a protected marine species.</p> <p>Marine Planning</p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance</p>

on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. If you wish to contact your local marine planning officer you can find their details on our gov.uk page.

See this map on our website to locate the 6 marine plan areas in England. For further information on how to apply the marine plans please visit our Explore Marine Plans service.

The East Inshore and Offshore marine plans were adopted on the 2nd April 2014, becoming a statutory consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe.

The South Inshore and Offshore marine plans were adopted on the 17th July 2018, becoming a statutory consideration for public authorities with decision making functions. The South Inshore and South Offshore Marine Plans cover the coast and seas from Folkestone to the River Dart in Devon.

The draft North East Inshore and Offshore marine plans were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North East Inshore and Offshore marine plans cover the coast and seas from Flamborough Head to the Scottish border. Consultation closed 20th April 2020. This was the final stage of statutory public consultation before we submit the marine plan.

The draft North West Inshore and Offshore marine plans were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North West Inshore and Offshore marine plans cover the coast and seas from the Solway Firth border with Scotland to the River Dee border with Wales. Consultation closed 20th April 2020. This was the final stage of statutory public consultation before we submit the marine plan.

The draft South East Inshore marine plan was published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South East Marine plan covers the coast and seas from Felixstowe in Suffolk to near Folkestone in Kent. Consultation closed 20th April 2020. This was the final stage of statutory public consultation before we submit the marine plan.

The draft South West Inshore and Offshore marine plans were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South West Inshore and Offshore marine plans cover the coast and seas from the River Severn border with Wales to the River Dart in Devon. Consultation closed 20th April 2020. This was the final stage of statutory public consultation before we submit the marine plan.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.

- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

Included files

Title Environment and Biodiversity

ID EGS14841

Person ID 325470

Full Name Gardener Family Trust

Organisation Details Gardener Family Trust

Agent ID 1270807

Agent Name Mr
Alistair
Brodie

Agent Organisation Henry H Bletsoe & Son LLP

Yes / No
* Yes
* No

Environment and Biodiversity comment

Section 18 - Environment & Biodiversity - Whilst it is acknowledged that our clients site is currently located within the Green Belt, it does not form part of, or adjoin, the Area of Outstanding Natural Beauty to the north and west of Heme! Hempstead.

Compensatory Improvements to the Green Belt - Our clients acknowledge the importance of this policy and confirm that they would look positively at the protection and retention of existing trees and hedgerows and the provision of new planting to replace any lost to development. This can be achieved either on site, or through cooperation with their neighbouring relatives, who own the land to the north and west of their site.

Included files

Title Environment and Biodiversity

ID EGS14880

Person ID 1144629

Full Name	Mrs SOPHIE LAWRANCE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Much of the current Green Belt land is rich in wildlife, mature trees and ancient hedgerows. The destruction of Green Belt and greenfield land will therefore also harm biodiversity in the area. Some of the developments appear likely to cut off key wildlife corridors (e.g. Bk08 which will remove natural habitat currently running alongside the A41, which is a hard barrier for wildlife).</p> <p>A key concern is the impact on the borough's chalk streams, which are a special habitat and which will be placed under undue strain as a result of the huge increase in housing in the area. As noted in the Sustainability Report, "<i>Over abstraction of water resources is an issue in the region. The Chilterns Chalk Streams are particularly susceptible to over abstraction</i>";²⁰ and "<i>Providing new homes in the Borough will put direct pressure on water resources (SA2) which are already identified as 'over-abstracted'</i>".²¹</p> <p>20 Interim Sustainability Appraisal Report, p.18. 21 Interim Sustainability Appraisal Report, p.25.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS14891
Person ID	1144629
Full Name	Mrs SOPHIE LAWRANCE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

<p>Yes / No * Yes * No</p>	<p>Yes</p>
<p>Environment and Biodiversity comment</p>	<ul style="list-style-type: none"> • DM27 (Landscape Character and Chilterns Area of Outstanding Natural Beauty)³² is in principle reasonable, but aspects are inconsistent with the proposed Green Belt boundary. For example, the policy states that major development affecting the setting of the AONB will only be granted if such development will conserve and enhance the Chilterns AONB's special qualities, distinctive character, tranquillity and remoteness, and will not "<i>negatively impact on the skyline views of the scarp slope</i>".³³ Yet the proposed removal of site BK06 (known locally as the Wishing Tree Field - see further Section 5.2 below) from the Green Belt and the proposed development on that site will affect the AONB (as views from the AONB must be taken into account) and will <u>not</u> conserve or enhance its special qualities etc, and will have a hugely negative impact on skyline views of the scarp slope from Bell Lane, Shootersway and Darrs Lane. • DM33 (Protection and Enhancement of the River Character and Water Environment) – while it is appropriate to state that the water environment will be managed so as to avoid the need to abstract water from the ground, in particular from the catchments of the Rivers Ver, Gade and Bulbourne, and to conserve and enhance biodiversity, the Plan is unclear as to how this is to be achieved, particularly given the <u>current</u> pressure on water abstraction (as noted elsewhere). • DM35 (Protection from Environmental Pollution) has similar problems to DM27, e. there are aspects of it that are inconsistent with the proposed Green Belt boundary alterations. For example it is stated that development proposals "<i>resulting in the need for exterior lighting will only be supported if there would be no significant (or material) adverse impact upon important features of the urban and rural environment including [...] the visual character of the natural and historic environment</i>". Clearly, the proposed removal of site Bk06 (Wishing Tree Field) from the Green Belt and the proposed development on that site will unavoidably result in new light pollution that will be visible from and will adversely affect the AONB. • DM36 (Tree Retention and Protection) states that "<i>Developers will be expected to protect and retain existing trees and hedgerows as part of development proposals, and to replace them where their loss is justified</i>".³⁴ This is obviously contradictory. It fails to provide criteria for determining the circumstances in which loss will be 'justified'. It also fails to give adequate recognition to the obligation in paragraph 174 of the NPPF to "<i>promote the conservation, restoration and enhancement of priority habitats</i>"; and the requirement in para 175(c) that "<i>development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons</i>". "Priority habitats" includes all habitats designated as being of "<i>principal importance</i>" under section 41 of the Natural Environment and Rural Communities Act 2006, and therefore includes hedgerows. "Irreplaceable habitats" include habitats which would "<i>take a very significant time</i>

[...] to restore, create or replace once destroyed". Such habitats extend to trees, particularly "ancient or veteran trees", but also other trees of a sufficient age to represent a valuable habitat that would take a long period to replace.

Dacorum Local Plan Emerging Strategy for Growth 2020-2039, p.101. 32 Dacorum Local Plan Emerging Strategy for Growth 2020-2039, p.114. 33 Dacorum Local Plan Emerging Strategy for Growth 2020-2039, p.114.

34 Dacorum Local Plan Emerging Strategy for Growth 2020-2039, p.129

Included files

Title

Environment and Biodiversity

ID

EGS14955

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

Environment and Biodiversity comment

Environment and biodiversity

Policy DM27 concerns the Chilterns Area of Outstanding Natural Beauty (CAONB). HCC fully endorses the aims of conserving and enhancing this designation and is aware and acknowledges that any development at Dunsley Farm Growth Area (Tr01) will need to be mindful of these objectively being adjacent the CAONB and visible from it.

Clauses 2d and 2e requires proposals both within the CAONB, or affecting the setting of the AONB, to meet the aims of the Chiltern AONB Management Plan and the comply with the Chilterns Building Design Guide. These documents set out important objectives for conserving and enhancing the However, the policies relate to development within the AONB, and whilst due consideration will be given to how any proposals at Growth Area Tr01 will affect the setting of the AONB, it is not considered that complying with the abovementioned documents in full is required for development beyond the AONB. The policy wording should therefore be amended to make this distinction.

HCC supports the general approach and objectives set out within **Policy DM28** in relation to the protection of nature conservation sites, however it is considered that the wording of this policy lacks clarity, in particular, there is no specific reference to Local Wildlife Sites. In the supporting text, Figure 8 makes reference to 'Wildlife Sites' being included in the hierarchy at the County/Sub Regional level. Policy DM28 then makes reference at clause 1 to 'important nature conservation sites' but it is not clear what this includes. The policy also makes reference to permitting development in 'exceptional circumstances', which is a phrase more usually associated with irreplaceable habitats (i.e. para.175 (c) of the NPPF). The use of the word 'exceptional' therefore needs to be used in the context of the correct level within the designation hierarchy. Finally, it is considered that the clause 3b.ii. and clause 3c.ii. need to be consistent in their terminology and reflect the sliding scale of importance between sites of Nationally Importance and County/Sub-Regional/Local Importance, which is not the case as presently worded. It is considered that the wording of this policy needs to more clearly link to recognised terminology and accord with the NPPF.

HCC acknowledges that the Chiltern Beechwood Special Area of Conservation is within reasonable proximity of the Dunsley Farm Growth Area, and as such, any proposals will need to consider how the potential impacts on the SAC might be mitigated as part of the proposals. **Policy DM31** sets out a checklist by which proposals must assess and mitigate potential What however, is not clear at this point, is the extent of the SAC 'zone of influence', which clause 5 of the policy states is defined on the Policies Map, but is not in fact provided at this time, as acknowledged in the relevant evidence box below. Defining the Zone of Influence is an importance part of the policy, which should be consulted on, and it is therefore disappointing that it is not available to comment on as part of this ESG consultation.

In relation to provision of trees as part of new development, as set out in **Policy DM36**, HCC reiterates the point made above in relation to **Policy DM22** that whilst the planting of new trees within development is supported in principle, the requirement of 'two trees per dwelling' on site is potentially onerous and may undermine the design process and optimisation of As mentioned above, the Growth Areas are required to prepare masterplans and be accompanied by design codes, which will enable the appropriate provision of soft landscaping, including trees to be secured. **Policy DM36** should reflect the flexibility expressed within the draft NPPF.

Included files	
Title	Environment and Biodiversity
ID	EGS14973
Person ID	1207224
Full Name	Chris Padley
Organisation Details	Environment Agency
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p><u>Environment and Biodiversity</u></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"> • Improve the river and the adjacent parkland for wildlife • Improve the opportunities for amenity and recreation around the river • Improve resilience to low flow events and climate <ul style="list-style-type: none"> • 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"> • 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 <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> <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.</p> <p>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.</p>

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.

18.8 – It may be worth mentioning the Hertfordshire State of Nature 2020 report here. It is a more up to date report and would be beneficial for your evidence base.

We are pleased to see this policy however it doesn't offer protection to important sites/habitats that have no designations.

We believe point 2 can be worded a little stronger, we suggest that the following wording be considered:

'2. Development proposals which are likely to cause harm to sites of nature conservation or geological interest will refused. In exceptional circumstances permission will be considered where the need for the development...

2.b. ... ~~and with the intent to achieve net gain~~ will achieve net gain in biodiversity'

We would also like clarification of the section 3 point 'imperative reasons of overriding public interest' and what circumstances this would look like. It could be argued protecting these sites would be in the most overriding public interest.

Point 5 should also mention that applications should also be assessed on a level of impact on wider ecological networks, whether there is an opportunity to create, enhance and restore habitats and make arrangements for the future maintenance/management of the wildlife site.

We are happy that you have included this policy in your plan. However we do not believe that the wording is strong enough to be effective. Priority species and habitats should aim for positive impacts rather than just avoiding negative impacts.

Please see the below suggested wording:

'1. Development is expected to avoid harm to biodiversity. Development which would result in damage to or loss of habitats of principal importance or the habitats of species of principal importance will not be permitted refused except:

- 1 in exceptional circumstances where the need for, and benefits of the development significantly and demonstrably outweigh the harm it would cause to the site; and*
 - 1 where the loss can be mitigated and compensation provided in line with the biodiversity net gain DEFRA metric and the mitigation hierarchy.*

- 1 Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development will not be permitted unless it has been demonstrated that the proposed development will not result in a negative impact upon those species and habitats positively protect and enhance the habitat for the protected species present and/or improve the quality of the priority habitat(s)'*

We are pleased to see the inclusion of this policy. We would like to see the inclusion of the Hertfordshire State of Nature 2020 Report in the supporting argument. It records mass declines in species and local extinctions over the last 50 years. Please also note that the natural England Biodiversity Metric 2.0 calculator has been updated to a newer version. This will need to be updated in your policy.

We suggest the policy references the need for a long term monitoring and management plan of biodiversity net gain sites, whether within the development area or off site. For the net gain sites to become established and effective, 30 years is a suggested period for monitoring/maintenance.

For good practice principles we would signpost <https://cieem.net/i-am/current-projects/biodiversity-net-gain/>.

Some examples of where other councils have started to make provisions for net gain can be found using the links below:

Policy SCLP10.1: Biodiversity and Geodiversity - <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

Policy GM-G 9 Standards for a Greener Greater Manchester - https://www.greatermanchester-ca.gov.uk/media/1710/gm_plan_for_homes_jobs_and_the_environment_1101-web.pdf

We are pleased to see a policy dedicated to enhancing rivers and waterways with a clear aim of protecting and improving the water environment and the recognition of the water environment's Water Framework Directive (WFD) status' and challenges.

Groundwater is a precious resource within the area, providing drinking water and a source for the borough's chalk streams and therefore must be protected, not just in Source protection Zones. It may be beneficial to reference The Environment Agency's Approach to Groundwater Protection

<https://www.gov.uk/government/publications/groundwater-protection-position-statements> in your supporting paragraphs.

Buffer zones are extremely important for biodiversity and creating green corridors. Another reason for buffer zones, in addition to biodiversity reasons, is access for maintenance of river banks and flood risk assets and for emergency works. This has health and safety implications for the public if this cannot be done. This can include plant so we stress the need for appropriate buffer zones. Lighting levels within the river and buffer zone should be less than 2 lux. This is to preserve the dark corridor natural environment that is favoured by many species, including bats which migrate and feed in these corridors and can be negatively impacted by adverse light conditions.

We approve of the discouragement of culverting. We will object to all culverting proposals except for in exceptional circumstances.

Culverts also pose challenges when they are not able to be opened up and we have many requirements to ensure their integrity:

- The developer must demonstrate why de-culverting is not possible or
- The developer must undertake a survey of the culvert in order to assess its exact location in relation to the proposed development as well as the condition of the The developer must be able to demonstrate that the condition of the culvert is acceptable before the development can proceed.
- The developer must demonstrate that the lifetime of the culvert is commensurate with the lifetime of the building or demonstrate how future upgrading and repair of the culvert will be possible with the building over or near the
 - The developer must demonstrate that there will be no loading on the culvert or that the culvert size and condition can withstand the Loading during and post-construction must be assessed.
- The developer must also demonstrate how access to the culvert for maintenance and emergency clearance will be achieved with the building sited over or near the This includes access to manholes/access chambers.
- The developer must demonstrate that the development will not block overland flood flow routes surcharging from the

As such we require culverts to be included within the waterbody buffer zone requirements specifically or you may want to consider having a culvert section in the policy.

The policy also does not mention the eradication, mitigation or management of invasive species, this should be included.

We would ask the addition of the following wording/rewording to strengthen the policy as per below:

'1. The water environment will be managed through development management and other action in consultation with the Environment Agency and the Lead Local Flood Authority to achieve the following objectives:

1 Opportunities for removal of culverts, river restoration and naturalisation of heavily modified watercourses ~~should~~ will be considered as part of any development adjacent to a watercourse. Proposals for new culverting of development of river corridors will be opposed unless fully justified' in exceptional circumstances'

1 avoid damage to all Groundwater including and specifically, Source Protection Zones

1 avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments;

'd. avoid development within 10 metres of the top of bank of a waterbody and within 10 metres and on top of culverts ;'

'e. proposals adjacent to a waterbody, must submit a WFD assessment which incorporate measures to improve, restore or reach 'good' ecological status / potential as defined in the Water Framework Directive, including invasive species management and will be required to preserve or enhance the water environment to a more natural state, with priority given to green engineering solutions; and'

1 secure opportunities to conserve and enhance biodiversity, to include reinstating and maintaining 10 metre natural buffer zones. Maintenance schemes should be provided with any development proposals alongside watercourses. Buffer zones should be of natural character, free from built environment, no light pollution greater than 2 lux, use of native species, reconnection with floodplain

- 1 *Invasive non-native species will be eradicated or where this is not possible mitigation and management plans will be provided for all applications where invasive non-native species have been found*

Paragraph 18.44 states that a Flood Risk Assessment (FRA) is required to demonstrate that proposed development will not create an increased risk of flooding from surface water. **This will need to be expanded to include fluvial (from rivers) and groundwater flooding.**

We note that you do not have a policy statement regarding flood zone 3b (the functional flood plain). Flood zone 3b is land that allocated to accept flood waters and therefore no development should be allowed. We have standing objections to any development within flood zone 3b. **This will need to be included to make the policy robust and to be found sound.** Flood zone 3b is allocated by yourself within your Level 1 SFRA.

Point 2.d. of the policy states that proposals should not cause harm to flood defences. While we agree with this statement, proposals should seek to improve defences if required or if the defences are not projected to have a life as long as the proposed development. Developers may be asked to contribute towards maintenance/refurbishment if protected by the defense, as is already the case along the Thames.

In point 3 of the policy we require clarification. It says sites in flood zone 1 but the measures listed need to be included in developments in Flood zones 2 and 3. Sites in Flood zone 1 will require a FRA if the site is 1 hectare or greater.

We are pleased to see the encouragement of SuDs. They use land effectively to maximise benefits to ecology and people, they provide open space and incorporate tree planting and soft landscaping. Some local authorities include policies on resisting the paving over of front gardens etc. with impermeable materials. Please note however that some developments may not be suitable for the use of SuDs, for example in Source Protection Zones where there is known contamination on site.

It should be better acknowledged that in order to adapt to climate change, developments need to be planned in respect of future flood risk. It should be included within this policy or supporting text that if a site is not currently shown to be within flood zone 2 or 3, but detailed modelling shows it is expected to be impacted when climate change is assessed, then the same design considerations should be applied as if it was within the present day flood zone. (For instance, a site may currently be in FZ1, but detailed modelling shows that in the future it is expected to fall within FZ3).

We would ask the addition of the following wording/rewording to strengthen the policy as per below:

'Development will be supported where:

- 1 It is designed to ensure that flood risk is not increased elsewhere and is located in areas at lowest risk of flooding (of all sources);*

- 1 It avoids Flood Zones 2 and 3 unless it is for a compatible use. Development will not be acceptable within Flood Zone 3b (the functional floodplain). Where development is proposed in Flood Zone 2 or 3a (or where modelling shows it will be in Flood Zone 2 or 3a in future due to climate change allowances):*

- 1 Flood Risk Assessments (FRA) must accompany planning applications, explaining how the sequential approach Test (23) (and the Exception Test (24) if required) to development has been undertaken and which the Council is satisfied demonstrates that the site is appropriate for development and its intended use, taking into account wider sustainable development objectives;*

- 1 a sequential approach to site layout must be satisfied, directing the most vulnerable uses to the areas on the site at lowest risk from of flooding from all sources;*

- 1 opportunities to reduce the cause and impact of flooding, such as using green infrastructure for flood storage, must be incorporated; and*

- 1 proposals must not cause harm to existing or proposed flood defences and wherever possible will seek to improve defences;*

- 1 For development in Flood Zone 1 (Should this be developments within flood zones 2 and 3a or in FZ1 but sites over 1 ha), a FRA or statement is submitted following the criteria in this policy and the NPPF which sets out appropriate flood risk management measures;*

- 1 It incorporates flood resistant and resilient measures, and is shown to be safe for the lifetime of the development, taking into account climate change implications;*

- 1 If necessary, it demonstrates that safe access and escape routes will be included as part of an emergency plan; (25)*

- 1 *Measures for the control and reduction of surface water run-off to pre-development rates or better through SuDS are integrated into the design and layout of the development and with existing green infrastructure wherever possible; and*

- 1 *For any major development (26) SuDS are accompanied by a management and maintenance plan detailing how they will be maintained throughout the lifetime of the '*

Please see **EA Appendix 1** for further flood risk opportunities that have been identified.

18.52 – This paragraph states ‘In Dacorum special consideration needs to be given to: The quality of the groundwater supplying the chalk aquifer’. This should also reflect quantity of groundwater, the two are not mutually exclusive and are important to one another. Due to the area’s status of ‘serious’ water stress, the quantity of groundwater that is not only used for drinking but provide water for the boroughs chalk streams is under threat.

We approve of the policy to protect groundwater quality. It would be beneficial to reference to Environment Agency Land Contamination Risk Management (LCRM)
<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm> in section 2.b.

Borehole soakaways are not advised. We are aware that some highways drainage soaks directly into chalk via boreholes and pose a risk of pollution to the chalk groundwater, which is used for drinking water supply. We would like to work with the LA to find alternative drainage options for existing borehole soakaways and encourage new developments to use shallow infiltration SuDS, where the land and type of development are suitable.

Please refer to Section G Discharge of Liquid Effluents into the Ground of The Environment Agency’s Approach to Groundwater Protection <https://www.gov.uk/government/publications/groundwater-protection-position-statements>.

Policy DM35 part 2c.ii. would be improved by removing the words ‘the quality’ so that it reads “Development which could adversely affect groundwater will not be permitted”.

This is because development that is detrimental to groundwater flow or quantity should also not be permitted. The types of development to which we would object are explained in The Environment Agency’s Approach to Groundwater Protection <https://www.gov.uk/government/publications/groundwater-protection-position-statements>.

We are pleased to see part 2c iii recognises the need for an Environmental Permit for many non-mains drainage systems.

We would like the light pollution section of the policy to state that the lighting statement should clearly show the light contours and lux levels on affected sensitive receptors such as rivers and river corridors.

Lighting levels within the river and buffer zone should be less than 2 lux. This is to preserve the dark corridor natural environment that is favoured by many species, including bats which migrate and feed in these corridors and can be negatively impacted by adverse light conditions.

Included files

Title Environment and Biodiversity

ID EGS15014

Person ID 1270845

Full Name DOMINIC LAWRENCE

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Environment and Biodiversity comment **Comments on policy DM27 (“Landscape Character and Chilterns Area of Outstanding Natural Beauty”)**

Generally, this policy is unobjectionable in itself. However, many of the proposed Green Belt boundary alterations are inconsistent with the policy, which raises the issue of irrationality. DBC’s site identification hand appears not to know what its policymaking hand is doing.

The policy states that major development affecting the setting of the AONB will only be granted if such development will “*conserve and enhance*” the Chilterns AONB’s “*special qualities, distinctive character, tranquillity and remoteness*”, and will not “*negatively impact on the skyline views of the scarp slope*”.

A good number of the proposed Green Belt boundary changes (to permit residential or mixed use development) will affect the AONB, and will not conserve or enhance its special qualities, tranquillity and remoteness, but will inevitably damage them. It is widely accepted that when considering whether development has an effect on an AONB, views from the AONB must be taken into account.[1] Even long-range views must be taken into account.

Comments on policy DM33 ("Protection and Enhancement of the River Character and Water Environment")

It is widely recognised that Hertfordshire's chalk streams are a rare, valuable and vulnerable habitat, which is considered to be of international importance. As noted above, **a strong case can be made that these chalk streams qualify as an irreplaceable habitat for the purposes of the NPPF.**

The NPPF states (at paragraph 175(c)) that "*development resulting in the loss or deterioration of irreplaceable habitats ... should be refused unless there are wholly exceptional reasons*". The use of the adjective "wholly" here indicates that irreplaceable habitats must be protected and preserved unless there are extraordinarily unusual circumstances, that provide a compelling argument that harm to such habitats can be sanctioned. Mere "common or garden" housing need, even if it is regarded as a pressing need, does not qualify.

The Chilterns' chalk streams are under threat from various forms of pollution, including sewage discharges, but the greatest threat comes from over-abstraction of water from the aquifers that feed them. This causes them to dry up, with devastating effects on wildlife.[2] Recently, the River Ver has been particularly affected by over-abstraction[3] but the Rivers Bulbourne and Gade have also experienced drought and consequential ecological damage.[4]

The "Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report" notes (at page 50) that:

"the underlying chalk aquifer is assessed as being 'over-abstracted'. Therefore, providing for a minimum of 16,596 new dwellings in the Local Plan period would increase this pressure on water resources. The effect is likely to become more significant over time as more dwellings are built and risk of periodic water shortages increases."

It is stated in policy DM33 that "*the water environment will be managed through development management and other action in consultation with the Environment Agency and the Lead Local Flood Authority*", inter alia so as to "*avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments*", and to "*secure conserve and enhance biodiversity*". However, the ESG says absolutely nothing about how this is to be achieved.

It is very easy to say that measures will be taken to avoid abstraction from the ground, but neither the proposed plan nor the supporting documentation provide any hint as to how this will be done. The “Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report Appendices” document notes at B.8.2.2 (page 49) that “*a higher growth scenario of 17,000 [new] homes*” in a 20 year period (i.e. roughly what the plan envisages) would create “*wider issues*” in relation to water management, including “*the supply of potable water*”. Essentially what is being said here is that development on the scale that is envisaged by the plan will place severe demands on the existing water supply arrangements and there is no concrete proposal for how this problem will be addressed.

A clear statement is required to explain how a 25% increase in the number of households in the borough will be supported without additional abstraction of water from the chalk stream catchments. In the absence of any such statement, the policy must be regarded as deficient, and incompatible with DBC’s obligations under paragraph 175(c) of the NPPF.

Comments on policy DM35 (“Protection from Environmental Pollution”)

Policy DM35 has the same sort of issues as policy DM27. Generally, it is unobjectionable in itself. However, many of the proposed Green Belt boundary alterations are inconsistent with the policy. Again, this raises the issue of irrationality.

For example, it is stated that development proposals:

“resulting in the need for exterior lighting will only be supported if there would be no significant (or material) adverse impact upon important features of the urban and rural environment including ... the visual character of the natural and historic environment”.

This laudable principle will inevitably be violated at a considerable number of the proposed development sites if these sites are released from the Green Belt.

To take just one example, the proposed removal of site Bk06 to the south of Northchurch (locally known as the “Wishing Tree Field”) from the Green Belt, and the proposed development on that site, will unavoidably result in **light pollution that will be visible from and will adversely affect the southern edge of Northchurch Common / the Ashridge Estate**, which forms part of the Chilterns AONB. Light pollution in the Chilterns AONB, due primarily to street lighting in nearby urban areas, is an existing problem which the Chilterns Conservation Board is seeking to reduce.[5]

[1] See e.g. *Stroud DC v SSCLG* [2015] EWHC 488 (Admin) at para 26.
 [2] See e.g. Living Rivers | Herts and Middlesex Wildlife Trust (hertswildlifetrust.org.uk) ; [wwf_chalkstreamreport_final_lr.pdf](#)
 [3] See e.g. Residents protested over lack of water in the River Ver on Sunday, September 22 | Herts Advertiser
 [4] See e.g. River Bulbourne - Wikishire ; How can we revitalise the River Gade through Gadebridge Park? - Environment Agency - Citizen Space (environment-agency.gov.uk)
 [5] See page 16: [Chilterns%20Magazine_ISSUE%202.LR.pdf](#) (chilternsaonb.org)

Included files	
Title	Environment and Biodiversity
ID	EGS15015
Person ID	1270845
Full Name	DOMINIC LAWRANCE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Comments on policy DM36 (“Tree Retention and Protection”)</p> <p>Policy DM36 states that:</p> <p><i>“Developers will be expected to protect and retain existing trees and hedgerows as part of development proposals, and to replace them where their loss is justified.”</i></p> <p>This appears contradictory, and is at the least very poor drafting. If the loss of trees and hedgerows is to be sanctioned in any circumstances, the policy must make clear what those circumstances are.[1]</p>

Not only is it the case that this proposed policy fails to provide criteria for determining the circumstances in which loss of trees or hedgerows will be “justified”, it also fails to give adequate recognition to obligations in the NPPF to protect aged or otherwise valuable habitats.

Para 174 of the NPPF requires plans to “*promote the conservation, restoration and enhancement of priority habitats*”. “Priority habitats” includes all habitats designated as being of “principal importance” under s 41 of the Natural Environment and Rural Communities Act 2006. The expression therefore includes hedgerows, which have been so designated. The level of protection to hedgerows under the NPPF is, accordingly, high. **The weak wording of policy DM36 (including the use of the word “expected” instead of “required”) is at odds with the strong protection of hedgerows which is required by the NPPF.**

As already noted, para 175(c) of the NPPF stipulates that “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons*”. “Irreplaceable habitats” is defined in the NPPF so as to include habitats which would “take a very significant time” “to restore, create or replace once destroyed”. Such habitats include “veteran trees”, but also other trees that would not generally be considered veteran but which nonetheless are of sufficient age to represent a valuable natural asset that would take many decades to replace.

The use of the expression “wholly exceptional” means that irreplaceable habitats (including veteran trees, and other trees of significant age and value) must never, or almost never, be lost or damaged. For such loss or damage to be sanctioned, the bar is set extremely high. “Mere” housing need cannot be a justification for such loss or damage, as such need is far from exceptional.

It follows that policy DM36, although better than nothing, is far from robust enough, and indicates a significant misunderstanding of what the NPPF requires in terms of habitat protection.

The inadequacy of policy DM36 is exposed by comparing it with paragraphs 2 and 4 of policy ENV1 in the South Oxfordshire Local Plan 2011-2035:[2]

“2. South Oxfordshire’s landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where it protects and, where possible enhances, features that contribute to the nature and quality of South Oxfordshire’s landscapes, in particular:

- 1 i) trees (including individual trees, groups of trees and woodlands), hedgerows and field boundaries;

1 *ii) irreplaceable habitats such as ancient woodland and aged or veteran trees found outside ancient woodland;*

iii) the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames, its tributaries and flood plains;

1 *iv) other watercourse and water bodies;*

1 *v) the landscape setting of settlements or the special character and landscape setting of Oxford;*

1 *vi) topographical features;*

vii) areas or features of cultural and historic value;

viii) important views and visually sensitive skylines; and

1 *ix) aesthetic and perceptual factors such as tranquility, wildness, intactness, rarity and enclosure. [...]*

1 *The Council will seek the retention of important hedgerows. Where retention is not possible and a proposal seeks the removal of a hedgerow, the Council will require compensatory planting with a mixture of native hedgerow species.”*

[1] The NPPF requires policies within development plans to be “clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals” (para 16(d)). Policy DM36 fails this test.

[2] Appendix F - South Oxfordshire Local Plan 2035 Non-track change version November 2020.pdf (southoxon.gov.uk) (see pages 168-169)

Included files

Title Environment and Biodiversity

ID EGS15061

Person ID	1270849
Full Name	Ms Jessica Lindfield
Organisation Details	St William Homes LLP
Agent ID	210999
Agent Name	Mr Martin Friend
Agent Organisation	Director Vincent & Gorbing
Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Environment and Biodiversity</p> <p>St William strongly support the inclusion of Policy DM30 – Biodiversity Net Gain. St William are already achieving net biodiversity gain on all of their sites. The Berkeley Group have an ongoing commitment to the biodiversity agenda and are committed to increasing biodiversity on all development sites. Achieving best practice by achieving or exceeding net gain is crucial to all developments being brought forward.</p> <p>Environmental Pollution</p> <p>No objection is raised to Policy DM35 such as it relates to contaminated land, and the process of risk assessment, investigation, remediation and verification is a standard process for addressing contaminated sites. It is important to note that the extent of remediation required on the National Grid site – already undertaken and necessary prior to development and the costs associated with such remediation – will be critical to determining overall viability.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS15079
Person ID	1162751
Full Name	Watford Borough Council
Organisation Details	Principal Planning Officer
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Watford Borough Council support the approach to achieve sustainable development including the target that Dacorum will become zero carbon by 2030.
Included files	
Title	Environment and Biodiversity
ID	EGS15135
Person ID	1270940
Full Name	
Organisation Details	CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Section 18 of the Emerging LP has regard to <i>Environment and Biodiversity</i> and BPC supports any policies that seeks to protect the landscape character and natural environment of the wider Borough and, in particular, those which will seek to preserve the landscape around the village of Bovington and areas within the parish boundary. BPC will expect that any promoters or developers of sites that are allocated within the Emerging LP will have full regard to all of the relevant policies as part of their development proposals.</p> <p>Policy DM34 has regard to Flood Risk and Protection and, through ongoing engagement with the promoters of the proposed housing allocation at Grange Farm, Bovington (Bv01), BPC is aware that the draft masterplan for that site will incorporate measures to alleviate known surface water drainage issues within and adjacent to that site, which BPC is supportive of.</p>
Included files	
Title	Environment and Biodiversity

ID	EGS15149
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>The Guiding Development policies put the need to meet housing targets above considerations such as climate change, sustainability, biodiversity and the need to promote public health. The Green Belt plays a key role in protecting the environment whilst overcrowding, traffic congestion and pollution harms people's physical and mental wellbeing. However, according to conservation group WWF, the UK is one of the most "nature depleted countries in the world". Ahead of hosting the November global climate conference, known as COP 26, the government wants councils to take action to protect the natural world, not to destroy large areas of Green Belt.</p> <p>There is a consensus across the natural, social, and health sciences on the impacts of nature experience on cognitive functioning, emotional well-being, and other dimensions of mental health: "According to numerous studies carried out after the first lockdown, being around nature is crucial to people's mental and physical health." https://advances.sciencemag.org/content/5/7/eaax0903</p> <p>Connecting with nature can help us feel happier and more energised, with an increased sense of meaning and purpose, as well as making tasks seem more manageable. On 26 February 2021, Hilary McGrady, director general of the National Trust, announced plans to plant blossom trees in cities to give people access to green space. The Green Belt fields in Northchurch give residents easy access to green space: somewhere, within walking distance of their homes, that people can breathe fresh air, connect with nature, and find solace during difficult times. Replacing this green space with brick, tarmac, noise and concrete will harm people's physical and mental wellbeing.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS15164
Person ID	1270925
Full Name	Mrs Kathryn Salway

Organisation Details	Extinction Rebellion Dacorum
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<p>Environment and Biodiversity</p> <p>New developments should ensure an increase in natural habitats (rewilding), connected with green corridors to neighbouring wild natural habitats.</p> <p>Designs which include green infrastructures in developments should be preferred, such as green walls, beehives, reed beds, green roofs, hedgerows, wildlife overpasses. See below from European Environment Agency.</p> <p>The procurement process should have a bidders prequalification phase with an environmental impact assessment demonstrating how bidders propose to protect natural habitats, improve quality of the overall environment: land, water and air as well as contributing to biodiversity.</p> <p>Mitigation should include a detailed plan on how to achieve zero emissions and carbon footprint.</p> <p>The plan should also guarantee the following:</p> <ul style="list-style-type: none"> • Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices. • Where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development should not be permitted. • All major developments must be required to deliver an overall net gain in biodiversity of 15%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator. • Air Quality Management Areas (AQMAs) should be introduced in each High Street Town in Dacorum with new developments to monitor decrease in pollution. • Control of polluted waters discharge to non-mains drainage prohibited. • Developments must be designed to ensure the lowest possible light pollution and utilise low energy lights. • Tree protection: Arboriculture Impact Assessment (AIA) including a tree survey identifying existing trees on and adjoining the site with their root protection areas (RPA); where tree protection measures are necessary, a Tree Protection Plan (TPP); and an Arboriculture Method Statement (AMS) that identifies how operations can be undertaken with minimal harm to retained trees.

- Integrate planting with the existing green infrastructure network, native broad-leaved species, and avoiding the use of invasive, non-native species; provide irrigation infrastructure and mature trees (>6years old).
- If villages are developed, the plan should guarantee a land reclaim for rewilding commercial forestry land or its equivalent.
- Priority must be given to the redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings).

Included files	XR Env comments.jpg
Title	Environment and Biodiversity
ID	EGS15207
Person ID	1264623
Full Name	Judy Chaussalet
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<u>Valuable, Unique Fragile Habitats that need Protection</u> : The River Bulbourne, an internationally important chalk stream, is endangered by over-development on a number of levels but especially with regard to over-extraction of water. These are extremely fragile and valuable habitats and should be fully acknowledged as such. The Chilterns AONB is potentially going to be designated a National Park during the plan period – this should be factored in at this stage. Also, adverse effects on the Chiltern Beechwoods Special Area of Conservation have not been fully considered.
Included files	
Title	Environment and Biodiversity
ID	EGS15208
Person ID	1271003
Full Name	Thierry Chaussalet
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<u>Valuable, Unique Fragile Habitats that need Protection</u> : The River Bulbourne, an internationally important chalk stream, is endangered by over-development on a number of levels but especially with regard to over-extraction of water. These are extremely fragile and valuable habitats and should be fully acknowledged as such. The Chilterns AONB is potentially going to be designated a National Park during the plan period – this should be factored in at this stage. Also, adverse effects on the Chiltern Beechwoods Special Area of Conservation have not been fully considered.
Included files	
Title	Environment and Biodiversity
ID	EGS15232
Person ID	1271006
Full Name	Ms Zoe Wiggins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> • Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area. • An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.
Included files	

Title	Environment and Biodiversity
ID	EGS15291
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	<p><u>Chapter 18 : Environment and Bio-Diversity</u></p> <p>The Crown Estate broadly support the principle of the policies in this Chapter.</p> <ul style="list-style-type: none"> • <u>Policy DM31 : Chilterns Beechwoods SAC</u> is particularly welcomed in terms of your Council's intention to prepare a 'Chiltern Beechwoods On-Site Access Management Strategy Scheme'. This will assist the practical implementation of the North Hemel Growth Area.
Included files	
Title	Environment and Biodiversity
ID	EGS15382
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

Environment and Biodiversity comment

Flood Risk Policies

There is a widely acknowledged surface water flood issue in Bovingdon and the Plan states that it would like to deliver flood improvements in Bovingdon. However, the Plan is silent on the point that Grange Farm is key for flood improvements as it will catch surface water coming from the north-west corner of the village and protect it from flooding existing housing, as it has in the past. The Council have not tied this to the delivery of Grange Farm. The draft Local Plan notes:

“Any development will need to have regard to the recommendations of the Level 2 Strategic Flood Risk Assessment for this site. – This is a follow-up analysis for any site identified as ‘at risk’ in the Level 1 SFRA, so is not part of the evidence base for consultation.”

In terms of the SFRA Level paragraph 1 8.1.1 records: *Significant surface water flow paths flow towards the River Gade, following the natural topography. This is reflected in the high number of surface water flooding incidents reported in Bovingdon, Frogmore End in Hemel Hempstead and Croxley Green, which have been identified, alongside west Watford, as SWMP hotspots.*

Grange Farm is identified under parcel SOSA_029 in the Appendix b schedule of site assessments – with 32% of the site area recorded at the 1000yr flood risk for potential Surface Water Flooding. The evidence base for the Local Plan clearly supports the ability to address existing issues affecting the wider settlement.

The FRA provided by Whiteacre shows a clearly defined channel of surface water risk extending from higher ground to the northwest, through the Green Lane/Leyhill Road junction and onto the site at the north-west corner. On-site it proceeds to channel through a shallow valley across the site, and away to the east, flooding larger parts of the village beyond.

Given the above information, the existing site is considered to have a medium risk of flooding from surface. Suitable mitigation measures to offset this risk will be implemented at the site. These measures will not only offset the risk of surface water flooding on site but will also reduce the risk off-site to the east, beyond Grange Farm.

Para 6.1.5 of the FRA states *“It is proposed to use a bund and deep-bore soakaways in the north-western area of the site to offset surface water flood risk from off-site. This is a provision, should Hertfordshire County Council be unable to fulfil their responsibilities with regard to managing flood risk in the areas within their control, namely, the Green Lane/Leyhill Road junction to the north-west of the site”*.

This clearly demonstrates that site would deliver wider benefits for surface water drainage issues in Bovingdon and this should be strengthened in the Plan and policies set out below.

Policy SP10 (Climate Change, Mitigation and Adaptation), which states that new developments should be resilient and contribute to climate change adaptation by:

“b. adapting to climate change by ensuring development avoids areas of flood risk and reduces the risk of flooding elsewhere, through the use of measures including sustainable urban drainage systems, green roofs and walls, and permeable surfaces”.

Policy SM22 (Sustainable Design and Construction) under part 4 also states that development should minimise water usage and risk of flooding by including SuDS (including green roofs and permeable surfaces around the curtilage of buildings and in street design), surface water storage and grey water recycling.

Policy DM34 (Flood Risk and Protection), states that development will be supported where Measures for the control and reduction of surface water run-off to pre-development rates or better through SuDS are integrated into the design and layout of the development and with existing green infrastructure wherever possible.

In the case of Grange Farm the introduction of specific criteria within the proposed policy text for the allocation would clearly illustrate that this can be achieved.

- There is a widely acknowledged a surface water flood issue in Bovingdon and the Plan states that it would like to deliver flood improvements in Bovingdon. However, the Plan is silent on the point that Grange Farm is key for flood improvements as it will catch surface water coming from the north-west corner of the village and protect it from flooding existing housing, as it has in the past. The Council have not tied this to the delivery of Grange Farm, whereas the promoters see the benefit in doing so.
- Whiteacre therefore argue that Grange Farm would deliver wider benefits for surface water drainage issues in Bovingdon and this should be strengthened in the Plan and under Policies SP10, SM22 and DM3.

Included files	
Title	Environment and Biodiversity
ID	EGS15459
Person ID	1271103
Full Name	GRAHAM RITCHIE
Organisation Details	FAIRFAX STRATEGIC LAND (HEMEL) LTD
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Environment and Biodiversity comment	SEE ATTACHED RESP
Included files	
Title	Environment and Biodiversity

ID	EGS15463
Person ID	350823
Full Name	Mrs Sue Yeomans
Organisation Details	Chairman Chilterns Countryside Group
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> The value of the Chilterns AONB and the Chilterns Beech Woods has not been adequately upheld in significance both to the Borough's residents and to the many visitors for whom they afford essential respite from urban living. The impact of Green Belt development upon the setting of the Chilterns AONB has been The CCG finds the LP fails to fulfil DBC's statutory obligation under the Countryside & Rights of Way Act 2000 s85 to 'protect and enhance the [Chilterns] AONB'. The permanent destruction for development of large swathes of the Borough's Green Belt adjoining the AONB and thus its setting, will certainly not be enhancements for the
Included files	
Title	Environment and Biodiversity
ID	EGS15502
Person ID	400475
Full Name	Mr Michael Demidecki
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	<p>Policy DM29 “Protected Species and Priority Species and Habitats Policy (page 117)</p> <p>New housing must not damage or destroy important wildlife sites. If housing development is permitted in TR01, TR02 and / or TR03 then existing hedgerows which are important wildlife corridors must be maintained.</p> <p>Policy DN30 “Biodiversity Net Gain (page 118)</p> <p>Housing development should include homes for people and wildlife (see report of this title published by the Wildlife Trust https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf)</p> <p>The Government has made a commitment to new housing development and houses themselves should be designed to integrate space for both wildlife and people as well as to reduce carbon emissions and minimise water storage.</p> <p>The Justice and Peace Group in Tring is seeking to work with others in making Tring a Bee Town by encouraging the retention and creation of areas suitable for pollinators –see flyer attached-.</p> <p>There is a potential in new housing developments such as envisaged in this Local Plan to create space for <i>native wild flowers in formal green spaces</i> as well as in gardens and wildlife friendly green roofs and walls. There should also be permeable boundaries between gardens and walls to allow movement of animals such as the hedgehog. Native wildlife friendly plants of local origin should be used in gardens and landscaping. With a planned new GCSE in the subject of natural history likely to be approved soon wildlife friendly landscaping of new school grounds is especially important as to provide a hands on experience and resource for children.</p>
Included files	
Title	Environment and Biodiversity
ID	EGS15539
Person ID	1271381
Full Name	Alison Walker
Organisation Details	Associate Director of Strategic/Large Projects Thakeham Homes
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Environment and Biodiversity comment	<ul style="list-style-type: none"> • Whilst Thakeham supports the Council’s general approach to requiring developers to protect and enhance existing trees and promote tree planting, we question the suitability and achievability of item 1 in the policy which states <i>“Developers will be expected to protect and retain existing trees and hedgerows as part of development proposals, and to replace them where their loss is justified. All development will be expected to incorporate two or more new trees per dwelling or per 100 sq m floor space (for non-residential developments) on-site. Where a tree is lost through development at least three new 'like for like' trees must be ”</i> • Thakeham is of the view that focussing on quality, location, and species of the tree is likely to deliver better results than focussing on quantity. Further, we would question how the landscape design of a smaller scheme would work if it was, for instance, required to deliver 100 trees on a development of 50 homes. Thakeham also questions the practicability of replacing a tree with three new ‘like for like’ trees as quite often, poor quality trees tend to be earmarked for removal. Thakeham believes either more achievable targets like one for one replacement on all trees/one for one new tree to dwelling ratio or a specified percentage for achieving biodiversity net-gain would be more a more appropriate mitigation. Thakeham supports a target of achieving at least a 10% biodiversity net-gain on all new housing sites.
Included files	
Title	Environment and Biodiversity
ID	EGS15582
Person ID	1271579
Full Name	
Organisation Details	BOYER PLANNING ON BEHALF OF W LAMB LTD
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	

- Policy DM30 requires a minimum 10% net gain for biodiversity. Whilst W. Lamb Ltd support the need to protect and enhance the natural environment, there is not yet any national requirement for a minimum 10% net
- The NPPF includes a requirement for biodiversity net gain, however no quantum is
- W Lamb consider that the policy wording should be amended as follows to ensure compliance with the NPPF:

“All major development will be required to deliver an overall net gain in biodiversity of 10%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator.”

Included files

Title	Environment and Biodiversity
ID	EGS15628
Person ID	1154177
Full Name	Nikki Hamilton
Organisation Details	Development Co-ordinator Herts & Middlesex Badger Group
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	Thank you for incorporating the policies in regards to bio diversity. We would suggest that you follow other local authorities and incorporate a 12m buffer around woodlands, hedge rows, priority habitats, wildlife habitats and all connecting corridors to be in line with national policy and the environment bill that requires for 10% net gain for bio diversity. This would help reach this and protect our hedgerows and woodlands.

Included files

Title	Environment and Biodiversity
ID	EGS15634
Person ID	1271974
Full Name	EMILY FORD
Organisation Details	SENIOR PLANNER
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> • The Local Plan is required to address obligations under the Habitats Directive in respect of the impacts of growth on the Chilterns Beechwoods Special Area of Conservation (SAC). We note that work to identify possible impacts because of recreational pressure is ongoing, with consultants appointed, and if likely significant effects are identified an Appropriate Assessment will be • We welcome this further work being undertaken by DBC to identify the impacts of the Local Plan on the Chilterns Beechwoods We recommend that this work is progressed as a priority to ensure that the Plan is prepared in accordance with legal requirements. • If required, Croudace are committed to working with DBC to identify and provide necessary This could be through the delivery of alternative public open space to reduce recreational pressure on the SAC within the West Berkhamsted Growth Area or the provision of financial contributions towards the identification and delivery of an off- site strategic Suitable Alternative Natural Greenspace (SANG) should that approach be considered more favourable. • We discuss how the Site could support recreational routes, thereby providing an alternative recreation opportunity to reduce pressure on protected sites, in Section 7 of these
Included files	
Title	Environment and Biodiversity
ID	EGS15643
Person ID	1271974
Full Name	EMILY FORD
Organisation Details	SENIOR PLANNER
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Environment and Biodiversity comment	<ul style="list-style-type: none"> • Consistent with national policy, consideration of the impact of major development on the Chilterns AONB is It is recommended that such consideration is proportionate to the scale of potential impact on the AONB and its setting. • As set out in response to Policy DM22 above, we support DBC in seeking to protect and retain existing trees and hedgerows as well as plant additional • However, we question whether a prescribed approach to the planting of new and replacement trees is In particular, where the loss of poor quality specimens is necessary to enable development, replacement planting should not focus on quantity but instead quality and ecological value. In this case, it is possible that a single new tree could be of greater ecological value than the existing tree and, as such, the proposed requirement for three species is unjustified. • In this context, we recommend that the policy is amended to specify that the quantum of tree provision identified is a guide and the quantum of provision for individual development sites is to be agreed with DBC officers, taking account of wider green infrastructure proposals including biodiversity metric calculations, the use of which is required by Policy
Included files	
Title	Environment and Biodiversity
ID	EGS15720
Person ID	1273151
Full Name	Ms Megan Green
Organisation Details	Senior Planner Thakeham Homes Ltd
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Environment and Biodiversity comment	<p>Whilst Thakeham supports the Council’s general approach to requiring developers to protect and enhance existing trees and promote tree planting, we question the suitability and achievability of item 1 in the policy which states <i>“Developers will be expected to protect and retain existing trees and hedgerows as part of development proposals, and to replace them where their loss is justified. All development will be expected to incorporate two or more new trees per dwelling or per 100 sq m floor space (for non-residential developments) on-site. Where a tree is lost through development at least three new ‘like for like’ trees must be provided.”</i></p> <p>Thakeham is of the view that focussing on quality, location, and species of the tree is likely to deliver better results than focussing on quantity. Further, we would question how the landscape design of a smaller scheme would work if it was, for instance, required to deliver 100 trees on a development of 50 homes. Thakeham also questions the practicability of replacing a tree with three new ‘like for like’ trees as quite often, poor quality trees tend to be earmarked for removal. Thakeham believes either more achievable targets like one for one replacement on all trees/one for one new tree to dwelling ratio or a specified percentage for achieving biodiversity net-gain would be more a more appropriate mitigation. Thakeham supports a target of achieving at least a 10% biodiversity net-gain on all new housing sites.</p>
Included files	

19 Managing Development in the Countryside responses

Title	Managing Development in the Countryside
ID	EGS15
Person ID	1253652
Full Name	erica vilkauls
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Why just go along with this ridiculous relaxation of planning rules. Stick up for our community and say no. Don't just roll over
Included files	
Title	Managing Development in the Countryside
ID	EGS56
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS207
Person ID	1257490
Full Name	Lucy Muzio
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Conserving and protecting' the natural environment. When you are choosing to build all over it, and remove land from greenbelt. Conserving and protecting is not taking away the local wildlife which includes a number of badger sets, bats and owls which nests in the barns on the adjacent to the back of grovehill. Red kites and ground nesting birds and lots of other animals live here. The land you have chosen to develop at the back of grovehill, (Growth Area HH02: North Hemel (Phase 2). You will be removing the majority of the only easily accessible open country side this side of Hemel Hempstead. Not only will this but you also be removing the only accessible bridleways for horse riders around this area. Horse riders need bridleways to escape the roads which are becoming busier and more dangerous to use every day. It will be also be taking away footpaths and open space which is used by a number of people for their own personal health, wellbeing, sanity and exercise. During the current lockdown and the last lockdown during the summer months this area has been filled with people exercising and enjoying the beautiful open countryside and the environment. Building over this area you will also be building over a lot of agricultural working farms and farmland. You will be removing someone's livelihood from them and their family and stopping the production of farms growing food which is important. What will they do then? When farming is all they have ever known what happens to their mental health and wellbeing. These farms are all currently active all being used to farm grow and supply food. Shouldn't we be looking after these farms now we have left the EU so we can sustain our own country? These areas have also been used to conserve wildlife for a number of years promote ground nesting birds etc and it has for many years been in the family for generations and is their home. The land in the area behind Grovehill as soon as it rains it is a flood zone. Without fail it floods every time it rains it would not be suitable for houses I don't believe any research has even been done on this area before it has been added onto these plans.</p>

Included files	
Title	Managing Development in the Countryside
ID	EGS261
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The plan's statement " the Plan needs to find a balance between restraint and ensuring a "living countryside" for village communities, for those that enjoy recreational activities there, and for the many rural enterprises it supports." sums my own feelings.
Included files	
Title	Managing Development in the Countryside
ID	EGS325
Person ID	1259852
Full Name	Imogen Wagstaff
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I do not agree that this proposal meets the criteria for exceptional circumstances to develop on green belt land and am firmly opposed to this. I believe that the needs of the community can be met in other ways without developing on greenbelt

land and that green belt land and the nature and biodiversity within these areas is effectively being destroyed for profit. I am firmly opposed to development on greenbelt land. This must be protected for all the good reasons stated in the NPPF, particularly as Dacorum has declared a climate emergency, these areas must be protected as a priority. It is not compatible with declaring a climate emergency to destroy natural ecosystems for new housing.

Included files

Title Managing Development in the Countryside

ID EGS357

Person ID 1259924

Full Name Bassil Aslam

Organisation Details

Agent ID 1259009

Agent Name Bassil
Aslam

Agent Organisation

Yes / No Yes
* Yes
* No

Managing Development in the Countryside comment Support is given to Policy SP11, 3. , Paragraphs 19.15 - 19.16, and Policy DM39 1b, etc, with reference to the proposed Housing site being put forward for consideration by the Council in Flamstead ie. Land lying to the West of Chequers Hill.

Included files

Title Managing Development in the Countryside

ID EGS376

Person ID 1260058

Full Name Redbourn Parish Council

Organisation Details

Agent ID 1260042

Agent Name David
Mitchell

Agent Organisation Redbourn Parish Council

Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	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.
Included files	
Title	Managing Development in the Countryside
ID	EGS410
Person ID	1260241
Full Name	BASSIL ASLAM
Organisation Details	
Agent ID	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Support is given to Policy SP11, 3. , Paragraphs 19.15 - 19.16, and Policy DM39 1b, etc, with reference to the proposed Housing site being put forward for consideration by the Council in Flamstead ie. Land East of Chequers Hill.
Included files	
Title	Managing Development in the Countryside
ID	EGS440
Person ID	1260485
Full Name	Nick Bowles
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	19.7 I totally reject your theory that you can build as you plan on green belt land as you claim there is an over-riding imperative for new housing there. All the legislation about the preservation of wildlife, their habitats and sustainability, instruct you to avoid this at all costs. To actively plan to further weaken the distinctive and rich environment of Tring and Northchurch is not justified by any government encouragement to allow housing development.
Included files	
Title	Managing Development in the Countryside
ID	EGS462
Person ID	1258868
Full Name	S M Gordon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	TR06 In the next few years Tring faces an unprecedented influx of new residents, most of whom will come from outside the town. It follows, therefore, that now more than ever Tring needs to foster a sense of place and a sense of ownership among its residents, both new and old. Tring Local History Museum does exactly that. The huge amount of work and money that has gone into creating this unique resource for the Town should not be thrown away. I have worked in the Museum sector for more than 30 years both at a local and a national level – promises to “relocate” small local museums within new developments are prone to being swept away at a later stage and quietly forgotten. Develop the Forge car park, the auction site and the Fire Station by all means, but leave Tring’s little gem of a museum alone – please.
Included files	

Title	Managing Development in the Countryside
ID	EGS463
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>With all this proposed development and loss of Green Belt, I am very concerned about the impact of increased visitors on the Chiltern AONB. Parking and lack of respect for the countryside is already a problem.</p> <p>What does 'washed over by the Green Belt' (19.11) mean? Surely, it's either Green Belt or it isn't?</p> <p>How can any development 'help conserve, restore or enhance the prevailing quality...of Dacorum's natural and historic landscape'?</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS540
Person ID	1260255
Full Name	KTB Commercial
Organisation Details	
Agent ID	1260252
Agent Name	Peter Biggs
Agent Organisation	
Yes / No * Yes * No	Yes

Managing Development in the Countryside comment

Paragraphs 19.13 to 19.21 and Policy DM39 provide further detail of how the Council defines “Selected Small Villages” in the Green Belt.

Paragraph 19.16 identifies Chipperfield, Flamstead, Potten End and Wigginton within the Green Belt as selected smaller villages. Paragraph 19.17 goes on to state that other settlements and hamlets in the Borough are not considered to constitute villages.

It is worth noting that whilst the Council make this statement in Paragraph 19.17, elsewhere within the Plan “Other small villages” are referred to, for example, within Table 1: Settlement Hierarchy.

The Council therefore appear to contradict themselves within the Plan as to what is and what is not a village.

Paragraph 19.17 seeks to provide a further guidance as to how the Council has classed a settlement as a village and sets out 4 criteria:

- they do not have the necessary cohesiveness to justify a boundary;
- they do not contain enough key services and infrastructure to warrant settlement status;
- they simply form the ribbon development of adjoining larger settlements; or
- in order to protect their intrinsic character from development.

In the case of Piccotts End, the Council’s Proposal Map provides a settlement boundary around what is considered by the Council to be the settlement edge. As such, this complies with the first criteria in that a sense of cohesiveness within the settlement.

Piccotts End has a public house, a number of businesses, antique, bus stops along Piccotts End Road, and the historic Piccotts End Paintings. These businesses, services and tourist attractions distinguish the settlement at Piccotts End from others. It is also located in close proximity to both Hemel Hempstead and the planned Growth Area of Hemel North. As such, it complies with the second criteria set out in Paragraph 19.17.

Piccott End itself cannot be classed as a form of ribbon development. It has a historic street forming a back bone to the village, with more recent development at either end. Although it is in close proximity to Hemel Hempstead, it does not adjoin the larger settlement, and has its own village identity. The third criteria therefore does not apply to Piccotts End.

The fourth criteria should not be used to define what is considered to be a village or not. Other policies within the Local Plan will seek to protect heritage assets and Conservation Area, and it should not be the role of policy DM39 to prevent development within these areas as a matter of principle. It is therefore considered that the fourth criteria is not relevant to considering what is and what is not classed as a village.

It is noted that this criterion for defining a village is taken from the Council’s Settlement Hierarchy Study Main Report October 2017. It was at this stage the Council took the view not to consider settlements, such as Piccotts End, as a village for planning purposes.

However, Piccotts End clearly has attributes of a village, in that it has a number of businesses providing employment opportunities, including the Marchmont Farm workshops, a metal fabrication firm, antique shop, and a fencing and landscaping company based within the village. All of these would have been classed as a higher-order service within

the 2017 report, if Piccotts End had been included in the review. The village also has The Marchmount Arms public house at its southern end, which would have been scored as a key service within the 2017 report.

The 2017 Hierarchy report also consider accessibility. Piccotts End has number of bus stops through the village along Piccotts End Road; there is a bus service that provides a direct route into Hemel Hempstead; the bus service runs Monday to Friday and after 9am; and there are fewer than 10 trains/buses per day. The 2017 Hierarchy report would have scored this level of bus service provision as limited, but as the village is within 5 km of Hemel Hempstead it would have been scored overall a Low Accessibility rating.

Based on this scoring and assessment of the settlement structure, at the very least Piccotts End should have been classed as a village. This assessment also does not take into account the proximity of the new service and facilities that will be provided at North Hemel Garden Community.

As such, Policy DM39 should be amended to recognise the opportunity that villages such as Piccotts End can provide in terms of delivering sympathetic high quality limited infill development in compliance with paragraph 145 of the NPPF 2019.

It is also proposed that the settlement boundary of Piccotts End should be amended to include the parcel of land to the south east of 92 Piccotts End, which is identified on the attached plan.

The attached document prepared by Douglas & King Architects, demonstrates how this piece of land is part of the village and that a small scale limited development of 3 properties on this land between 92 Piccotts End and the proposed village boundary, would significantly enhance the appearance of the site and views of the Piccotts End Conservation Area.

Included files	PCTe_Feasibility Doc_Jan 2021.pdf
Title	Managing Development in the Countryside
ID	EGS576
Person ID	1261023
Full Name	Richard Brash
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	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 placemaking 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 Managing Development in the Countryside

ID EGS606

Person ID 1261122

Full Name Mark Slade

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
 * Yes
 * No

Managing Development in the Countryside comment

Included files

Title Managing Development in the Countryside

ID EGS633

Person ID 1261183

Full Name Oliver Fairfull

Organisation Details

Agent ID

Agent Name

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

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 Managing Development in the Countryside

ID EGS656

Person ID 1258939

Full Name Ed Shedd

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Managing Development in the Countryside comment Policy SP11 - paragraph 1: Can you clarify what "land will be managed as countryside until required for development" means? This is especially important for the area of land north of Hemel reserved for 4,000 homes after 2038. Does this mean increasing biodiversity and enhancing the land, such that new homes post 2038 have to build on that improved base? Or does it simply mean, leave the land empty for decades? This is important, as being a lay reader in this regard, I would suspect that the incentive for land owners to degrade the land and encroach on the countryside, knowing that it has been reserved for development, will only increase over time. It is especially important as there is no guarantee that this land will actually be needed for development, and as such needs to be maintained and improved in line with environmental policies and the 25 year Environmental plan.

Included files

Title Managing Development in the Countryside

ID EGS690

Person ID	1249904
Full Name	Mrs Christine Ridley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>In this section, the same theme persists - admirable aspirations which are immediately ignored in favour of development. For example:</p> <p>19.6 <i>The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances.</i></p> <p>7.6 <i>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></p> <p>I would like to know how the council can justify building 10,000 houses on Green Belt land, while bearing this statement in mind. What are these exceptional circumstances?</p> <p>I have found no convincing evidence of exceptional circumstances mentioned in the new plan.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS716
Person ID	1261251
Full Name	Lesley Ashden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Managing Development in the Countryside comment	Good objectives but the overall numbers will have to be challenged to have any hope of meeting them
Included files	
Title	Managing Development in the Countryside
ID	EGS742
Person ID	1261250
Full Name	Christina Thompson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I do not agree with the use of green belt for development purposes. The proposals in Tring also propose the destruction of farmland which will destroy the character of the town completely.
Included files	
Title	Managing Development in the Countryside
ID	EGS753
Person ID	211245
Full Name	Ms Jody Conibear
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Managing Development in the Countryside comment	The proposal to build on vast swathes of green belt land is hugely upsetting. This areas is nationally renowned for its landscape and wildlife and the expansion of Tring in particular across swathes of green belt is totally unnecessary when viewed in combination with my other points about reducing future office space (rather than creating more) and focusing on more urban building opportunities. Looking at this plan, there is a continuous trail of concrete and housing from London expanding out from the A41 all the way to Aylesbury now. When viewed from the air, this will become a London metropolis which is exactly what the Green Belt was trying to stop. I can see the government has put pressure on councils such as Dacorum to take on unreasonable housing targets however to build out Tring to the Grand Union canal and Ridgeway is trashing our beautiful areas of green space and wildlife for future generations. I urge the council to take another look at infilling in existing towns and vastly limit any building on green belt land (which is not proposed in this plan).
Included files	
Title	Managing Development in the Countryside
ID	EGS980
Person ID	1261604
Full Name	Karin Voller
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Comments are specific to the Tring development projects:</p> <p>For the community that live in East Tring, access to the countryside has been vital for health, fitness, and in particular mental health. Developments on Dunsley Farm, and similarly either side of Marshcroft lane, will restrict this access and urbanise the whole Eastern side of town. This will lead to reduced enjoyment and use of the countryside, and increased use of cars to access the beautiful countryside that surrounds the town. A walk on any given day throughout lockdown, in all weathers shows how many people use these routes. the route down marshcroft lane includes access to the canal, and links with Berkhamsted and Wendover, for runners, walkers and cyclists, a route which many wouldnt even consider if they had to cycle or run on the roads. It would be such a shame to suck the rural atmosphere out of such a vibrant town. Tring Park does not have additional car parking facilities, and the problems down Hastoe Lane with parking indicate that the area is already operating at a maximum capacity. Add in all the new houses, and then the fact that those on the Eastern side of town will now have to drive to the countryside, the nature and feel of the area will be spoilt, and lead to</p>

additional parking needs in villages such as Wigginton, in the green belt areas. Green space is proven to improve the mental well being of people, and making access harder will lead to a decline in mental health of the people of Tring.

Included files

Title Managing Development in the Countryside

ID EGS1129

Person ID 1143779

Full Name Ms Julia Marshall

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
* Yes
* No

Managing Development in the Countryside comment

Included files

Title Managing Development in the Countryside

ID EGS1224

Person ID 1142889

Full Name Dr Peter Chapman

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Managing Development in the Countryside comment	Dacorum is fortunate to inherit 60% of Green Belt. Para 19.5 gives 5 good reasons for preserving it. Para 19.6 refers to exceptional reasons for putting it to other uses. No doubt Lawyers will argue endlessly over what constitutes 'exceptional'. I would make the point that once it gets round that a particular Borough has made changes to the Green Belt others will follow. It is for this reason that changes to the Green Belt should be resisted. Otherwise how much in percentage terms of Green Belt are we going to lose ?
Included files	
Title	Managing Development in the Countryside
ID	EGS1225
Person ID	1261408
Full Name	juanita mann
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>The Government said: "We have been repeatedly clear that demand for housing alone will NOT change Green belt boundaries." This proposal is incompatible with this statement and policies to protect the Green Belt , AONB and the intrinsic character of the countryside. In particular the development to the East of Tring where urban sprawl will increase and the countryside will suffer serious encroachment.</p> <p>In addition parts of the proposed East of Tring site act as a natural flood plain for winter weather and storms. (recently Feb 2020 & Feb 2021) Building would remove flood protection at a time when climate change is making rainfall and storms more intense.</p> <p>The Green Belt should be there for people to enjoy, for nature to thrive and to protect the climate. It should be made more green not covered in tarmac and bricks.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS1243

Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS1302
Person ID	1261957
Full Name	Jeremy Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>According to 19.4 in Dacorum 60% of the land is designated as Green Belt. The Green Belt should be protected.</p> <p>In the wake of Covid-19 the open spaces in the Green Belt area are coming under increasing pressure for recreational use. But the Green Belt is also presently coming under pressure from property developers trying to develop on Green Field sites because the margins are better than on Brown Field sites.</p> <p>At the moment the Green Belt areas need greater protection from property developers and more investment needs to go into maintaining footpaths and allowing access whilst minimising the destructive effects of overuse. The impacts we have seen as a result of the lockdown restrictions are just a taste of things to come.</p>

Included files	
Title	Managing Development in the Countryside
ID	EGS1336
Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	building on green belt is nit managing the countryside
Included files	
Title	Managing Development in the Countryside
ID	EGS1361
Person ID	1262046
Full Name	Mr Richard Abraham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Your arbitrary decision to take land out of the Green Belt due to what you say are 'exceptional circumstances' is at best questionable.
Included files	

Title	Managing Development in the Countryside
ID	EGS1398
Person ID	1258930
Full Name	Nicols Bowmaker
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Because the government has been relaxing rules on green belt land does make mean we should be building on it. Green belt land should be protected for future generations and should not be developed.
Included files	

Title	Managing Development in the Countryside
ID	EGS1486
Person ID	1142526
Full Name	Mrs Angela Goddard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The government are rethinking their relaxation policy on the basic algorithm of new houses needed, and you should wait for the outcome of this.
Included files	

Title	Managing Development in the Countryside
ID	EGS1507
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	

Title	Managing Development in the Countryside
ID	EGS1516
Person ID	1262227
Full Name	James White
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside 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 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, we must as a community come together and agree a way to sustainably ensure new homes are built for local young families. The only way to do this is through Dacorum Borough Council and Three Rivers District Council finalising their Local Plans. That's why I'm putting pressure on the councils to get on with it. I have also written to Minister Rt Hon Chris Pincher at MHCLG about my concerns."**

Surely, in addition to the points raised above, the plan should also now take into account the effect of the past year's two major occurrences, namely Brexit and Covid. With Brexit impacting the level of inward migration from the EU, and with overall inward migration levels down and likely to remain lower than in previous years for some time to come, is it right that precious Green Belt land should come under pressure to provide housing that is no longer required? Furthermore, whilst the border situation will no doubt be resolved in due course and that food imports will continue to flow, does it not seem inappropriate to allocate productive farmland to housing when we would be far better off concentrating on producing our own food without relying on overseas producers?

As for Covid, this year has shown everyone the importance of green open space for recreation and relaxation. Green Belt land, whether farmed or left to nature, enhances and enriches our lives and access to it has been a lifeline to many over the past year. Once that land has been turned over to housing, regardless of incorporating "nature strips" and green areas, the loss is palpable and irreversable. If housing is required then the focus should be on brownfield sites which currently serve only to blight the surrounding area, not on greenfield sites that bring joy and pleasure to so many.

Included files	
Title	Managing Development in the Countryside
ID	EGS1543
Person ID	1253872
Full Name	Georgia Huelamo
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Managing Development in the Countryside comment	<p>This vision and its objectives do not take into account the CCB Management Plan, which 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 that a development outside the AONB boundary can 'cause harm to the AONB, even if it some distance away'.</p> <p>Therefore 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).</p> <p>I am really concerned about how the Council will oversee development in the countryside. I can't see anywhere that give assurances about the ongoing protection of ancient hedgerows, woodlands and green spaces.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS1647
Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS1684
Person ID	1165136
Full Name	Mr & Mrs J.D Battye
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>GREEN BELT.</p> <p>Once more we re-iterate the plan's own words at 1.35 "Dacorum is uniquely constrained. Its water resources are over-abstracted (Int.SA B p.48)and higher growth will create issues over the supply of potable water (Int.SA B p.49.)"Why is DBC not arguing these facts with central government as "exceptional."? After all the present Government was elected on a manifesto pledge to protect Green Belt land; indeed the present Member for SW Herts says he made it a particular feature of his campaign. The NPPF (2019) states that the Government attaches great importance to the Green Belt :at 7.6 it requires authorities "to fully explore the potential to make effective use of urban land (paras.118&137) especially before considering the "exceptional circumstances" required for justifying Green Belt releases for housing purposes." The plan even acknowledges this. (v. 2.20, 5.2, 7.6) and yet 2.23 euphemistically cites "some" development. In the cases of Tring (almost 100%) and Berkhamsted (90%) it is a hugely significant proportion of the proposals. The plan thereby breaches the provisions of the NPPF at 136, 137a & b,139 &1 44 and even fails itself at SP1.i.b.ii.</p> <p>19.1 states specifically that Green Belt and rural area restrictions(which apply to 60% of Dacorum's land(19.4)) overlapped by Chilterns AONB..."are generally areas of protection where new development will be restricted."</p> <p>18.5 states "The NPPF expects planning policies to conserve and enhance the natural environments and protect them from harm."</p> <p>How are those statements consistent with the numbers of Green Belt housing totals cited above under "Location of Development" ?</p> <p>The planning White Paper insists that local authorities should consider all other reasonable options before Green Belt and that GB areas should be amended "only when local authorities have fully examined all other reasonable options for meeting their housing requirements". The plan has not performed this test as rigorously as required. As mentioned elsewhere, the formulation of the Spatial Strategy is flawed and the selection of sites is inconsistent with higher scoring sites being rejected. How does the rejection of more sustainable sites produce the exceptional circumstances required for legitimate Green Belt release?</p>

Moreover example 9.7 states that there is "Capacity for a substantial increase in convenience shopping floorspace." but the 2020 study is cautious about translating this provision on the ground. Similarly, while current legislation is not ideal, conversion of redundant office space to affordable housing should continue in preference to the supposedly exceptional measure of raiding the Green Belt. Surely Use Class E is now wide enough to cater for what office demand there might be in the wake of Covid-19. (16.4 Table 20.) The ban on such conversions should be confined solely to designated industrial areas where there is a genuine need for space (Table 18) .

The plan acknowledges(at 18.1) that the natural environment is one of the Borough's greatest resources and encompasses the landscape of the countryside and green infrastructure. This is enshrined in DM 27 at 1. Also the plan recites "exceptional circumstances" at 2.9, 19.6 yet that appears to have been watered down already by 5.2-"minimising the requirement for development on Green Belt land" and at 2.24-"to protect the character of the wider countryside and the value of protected/important sites "as far as possible". The intended site distribution renders 7.10 redundant - "Most new homes will come forward from urban sites". Elsewhere the plan misleadingly claims "A strong urban focus to the housing programme. "Compare that statement against the figures from Table 2. at 7.7 -5838 urban homes against 5945 homes on strategic greenfield sites .

Due diligence has not in our view been exercised sufficiently to ensure compliance with the Government's stated conditions for Green Belt release .The NPPF makes it clear that urban land should be used for development before Green Belt is even considered. We make mention above of sites in Hemel Hempstead, King's Langley and Bovingdon which score well in the Sustainability Appraisal but have been rejected in favour of Green Belt releases in Tring, Berkhamsted and Bovingdon.2.12 may pay lip service to the required procedure but the reality of the plan is very different. The Development Strategy Paper is particularly disingenuous in claiming at 6.9 that 2/3 of the new housing will be on urban land and misleadingly makes no specific mention of Green Belt development in Berkhamsted and Tring (6.19-6.27.)

If "exceptional circumstances "are satisfactorily proven it is essential that compensation as detailed at 2.21 is fully implemented before the offending development is initiated. Current plans do not look promising in this regard.

The ease with which parts of the Borough's Green Belt have already been "re-designated"(i.e. removed for development) is at complete odds with the responsibilities of the local plan under the Climate Change Emergency declared by the Borough in 2019: "to include all available measures to cut carbon emissions and reduce the impact on the environment." (17.3).

As it is, many of those new homes look like destroying a sizeable area of Green Belt land around Tring and Berkhamsted, itself surrounded by AONB land (23.99) This is not consistent with DM27 or DM 35 ,e,1. Is the Council rating urban land in Hemel Hempstead where the principle of connectivity is at its best of a higher ecological status than Green Belt land

which Government policy is designed to protect? Are some of the post-war swathes of cropped grassland and treeless areas of Hemel Hempstead more biodiverse and sustainable than the Green Belt? Contrary to official policy has sufficient effort been made to accommodate development on lower-ranking land in order to justify the re-classification and release of certain Green Belt areas? Will some of those areas ever revert to their original intended status when events prove the Government's algorithm to be truly flawed?

To summarise, how can the destruction of large areas of Green Belt land be consistent with policies DM22, DM 28, DM29, let alone achieve a 10% net gain in biodiversity as demanded by DM30?

SP4 is particularly disingenuous in its mention at j-use of Green Belt land. Int SA D 33 states "By restricting levels of development in the Green Belt the policies would minimise the negative effects" and the first objective of enhancing biodiversity would be more likely to be achieved.(SP11) - an obvious statement but at odds with what is actually being planned. Similarly a greater regard needs to be paid to soil retention as highlighted at Int SA p.63.

This plan is transgresses national policy (1.28 d.) and fails to "contribute to and enhance the natural and local environment (NPPF 170). It also fails to ensure development "is appropriate"(NPPF 180.)

"Exceptional circumstances" for Green Belt release mean exceptional circumstances and should trump the uncertain and, in places ,unrealistic claims of connectivity both present and future.

Included files	
Title	Managing Development in the Countryside
ID	EGS1741
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Managing Development in the Countryside comment	SP11 Green Belt. I would wish that green belt and AONB about Tring in particular is defended. SP12 Generally development should be resisted but I do agree that sensitively handled, the exceptions could be permitted.
Included files	
Title	Managing Development in the Countryside
ID	EGS1816
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>My response is as per BRAG's response which I fully support:</p> <p>'The Managing Development in the Country' section is at best muddling and confusing, but at worst malicious. In paragraph 19.5 it lays out the NPPF's five key purposes of the Green Belt. And then in 19.6 explains "The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 136)." But critical NPPF text is omitted that states "where exceptional circumstances are fully evidenced and justified".</p> <p>19.6 does continue "In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries. The Sustainable Development Strategy sets out these challenges and establishes why a planned review of Green Belt Boundaries is justified to meet development needs." And again in 19.7 "We explore the justification for this in the 'Sustainable Development Strategy' chapter of the Plan." However, section 4 is titled 'Sustainable Development in Dacorum' and it spans just a single page (two if you count the map) of this 368-page document, while containing only 3 numbered paragraphs and one policy SP1.</p> <p>BRAG cannot discuss either the evidence or justification because nothing on that page resembles evidence or justification.</p>

BRAG has dug deeper into the myriad of supporting evidence documents and can only find DBC's assertion that the Government's 922dpa housing 'need' assessment must be accepted as a target as justification for the Green Belt releases. DBC's argument being "Any option below the standard methodology would have to be robustly justified" (paragraph 5.8 of The Development Strategy Background Topic Paper).

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

DBC seem to have mis-understood their responsibilities. Paragraph 136 of the NPPF is clear 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified', and not the other way round.

Paragraph 1 of Policy SP11 is badly written, in particular the sentence "The Green Belt boundary has been reviewed to land in defined Growth Areas to meet identified need over the lifetime of the Plan and to allow for other minor consequential changes."

BRAG is unsure of the exact meaning of this sentence, but it could be construed that the Green Belt boundaries changes proposed are minor. They are most definitely not – Berkhamsted's urban footprint will increase by a massive 31%.

Included files

Title Managing Development in the Countryside

ID EGS1898

Person ID 488516

Full Name mr hugh siegle

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Managing Development in the Countryside comment 19.5 lists the 5 key purposes of the Green Belt. These draft proposals breach three of these, namely 1 to check the unrestricted sprawl of large built up areas, 3 to assist in safeguarding the countryside from encroachment and 4 to preserve the setting and special character of historic towns. The Council believe that exceptional circumstances exist to

justify these breaches. An attempt is made in 19.6 and 19.7 to explain what these exceptional circumstances are without giving any facts or detail, merely stating they exist.

Failure to protect key purposes of the Green Belt without a robust explanation renders this draft plan unsound.

Included files

Title Managing Development in the Countryside

ID EGS1921

Person ID 1262553

Full Name Henry Wallis

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Managing Development in the Countryside comment

Included files

Title Managing Development in the Countryside

ID EGS2022

Person ID 1262601

Full Name Anne Smith

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment	<p>The Dacorum Local Plan is not in line with its own Managing Development in the Countryside policies.</p> <p>The local plan does not check the unrestricted sprawl with Green Belt impacted in Northchurch as example. The plan already mistakes Northchurch as an adjunct to Berkhamsted, showing a disregard for characteristics of individual towns and villages. Both proposals in Northchurch alone do not safeguard the countryside from encroachment. Northchurch is an extremely historic settlement dating back to AD60 and with one of the oldest churches in Hertfordshire, intended build additions of densely packed dwellings does not preserve the setting of this church and the Chilterns (AONB).</p> <p>There is no evidence in the local plan as to what the exceptional circumstances are for the Green Belt boundaries to be amended. With the population of Dacorum remaining fairly static until Brexit and the pandemic and now with a net export of 1.3 million people from the UK, these exceptional circumstances seem unlikely.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS2026
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Managing Development in the Countryside comment	<p>19.6 There are no special circumstances to justify the unsustainable and inappropriate building proposed on Green Belt land around Northchurch right next to the Chilterns AONB. 19.5 Such development at Northchurch would be contrary to the 3rd and 4th key purposes established by the NPPF. It could be argued that development at Lock Field is intended to breach key purpose 2 by extending urban style housing up to the rural hamlet of Dudswell which lies within the Parish of Northchurch, but currently maintains its own character.</p>
Included files	
Title	Managing Development in the Countryside

ID	EGS2061
Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS2116
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Managing Development In The Countryside. Development on green belt in Berkhamsted goes against all of the five key purposes of the green belt and is totally unnecessarily. Just because it is classed as a town it shouldn't mean that our green belt should be destroyed and is any less valuable to the town than a smaller village. Once it is gone we cannot put it back. Berkhamsted has already lost substantial land to several large developments and we have already contributed massively to the growth plan but we can't take all of the development whilst the villages are left unscathed.
Included files	

Title	Managing Development in the Countryside
ID	EGS2169
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The 2000+ houses on Site No 124 does NOT comply with any of the NPPF purposes it seems to us. How can you justify this development other than you are meeting your objectives. Frankly you are just shooting yourself in the foot by even raising this topic.
Included files	
Title	Managing Development in the Countryside
ID	EGS2212
Person ID	1262765
Full Name	Paul Rees
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	To manage the countryside in a way that is sustainable, supports biodiversity and does not add to climate change, Dacorum needs to recognise that an inconvenient truth is that far fewer homes can be built than has been assumed and villages in the green belt such as Kings Langley need to be spared the onslaught of mass delivery of new homes at

scale. The idea of building an additional 275 new homes in an historic village such as Kings Langley goes against the notion of effectively managing development in the countryside.

Included files

Title Managing Development in the Countryside

ID EGS2227

Person ID 1262860

Full Name Susanne Rees

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment In order for the countryside to be well managed, all villages should be given sufficient protection. This means that all villages in the green belt, such as Kings Langley, should be protected against large-scale housing. An additional 275 new homes would change the character of Kings Langley forever, even though it is an historic settlement, which was once the capital of England.

Included files

Title Managing Development in the Countryside

ID EGS2270

Person ID 1262925

Full Name Nandipha Jordan

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No	
Managing Development in the Countryside comment	<p>Again, the calculation of the need for housing is flawed.</p> <p>Para 11(b) of the NPPF requires ‘objectively assessed needs for housing’. The number of houses should specifically meet Dacorum’s need for the full range of affordable social housing, as defined in our answer to question 1.</p> <p>The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impact on the Green Belt and AONB.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS2296
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Managing Development in the Countryside comment	<p>‘The Managing Development in the Country’ section is at best muddling and confusing, but at worst malicious.</p> <p>In paragraph 19.5 it lays out the NPPF’s five key purposes of the Green Belt. And then in 19.6 explains “<i>The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 136).</i>” But critical NPPF text is omitted that states “<i>where exceptional circumstances are fully evidenced and justified</i>”.</p> <p>19.6 does continue “<i>In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries. The Sustainable Development Strategy sets out these challenges and establishes why a planned review of Green Belt Boundaries is justified to meet development needs.</i>” And again in 19.7 “<i>We explore the justification for this in the 'Sustainable Development Strategy' chapter of the Plan.</i>”</p>

However, section 4 is titled ‘Sustainable Development in Dacorum’ and it spans just a single page (two if you count the map) of this 368-page document, while containing only 3 numbered paragraphs and one policy SP1. BRAG cannot discuss either the evidence or justification because nothing on that page resembles evidence or justification.

BRAG has dug deeper into the myriad of supporting evidence documents and can only find DBC’s assertion that the Government’s 922dpa housing ‘need’ assessment must be accepted as a target as justification for the Green Belt releases. DBC’s argument being “*Any option below the standard methodology would have to be robustly justified*” (paragraph 5.8 of The Development Strategy Background Topic Paper).

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

DBC seem to have mis-understood their responsibilities. Paragraph 136 of the NPPF is clear ‘*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified*’, and not the other way round.

Paragraph 1 of Policy SP11 is badly written, in particular the sentence “*The Green Belt boundary has been reviewed to land in defined Growth Areas to meet identified need over the lifetime of the Plan and to allow for other minor consequential changes.*”

BRAG is unsure of the exact meaning of this sentence, but it could be construed that the Green Belt boundaries changes proposed are minor. They are most definitely not – Berkhamsted’s urban footprint will increase by a massive 31%.

Included files	
Title	Managing Development in the Countryside
ID	EGS2342
Person ID	1261830
Full Name	alistair budd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	

Included files	
Title	Managing Development in the Countryside
ID	EGS2384
Person ID	1254107
Full Name	Polly Eaton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I think there is a lack of open or public space in all the proposals. Building on swathes of countryside is not going to enhance wildlife. There needs to be greater consideration to this. Trees need to be preserved.
Included files	
Title	Managing Development in the Countryside
ID	EGS2385
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I do not agree that it is "essential" to concrete over Green Belt land. My uncomfortable conclusion is that Green Belt is easier and more profitable for developers to build on.

The problem is, once it is gone you can never get it back. One of the key purposes of the Green Belt as quoted is "to preserve the setting and special character of historic towns", another is "safeguarding the countryside from encroachment". That is exactly why these proposals would be a disaster, and why the Local Plan should not be approved.

Included files

Title Managing Development in the Countryside

ID EGS2420

Person ID 1227518

Full Name Mr John LOWRIE

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Managing Development in the Countryside comment

Included files

Title Managing Development in the Countryside

ID EGS2446

Person ID 1262981

Full Name Chris Mabley

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment	Experience says the Local Plan does not offer restraint on unsustainable development in the countryside, nor does it ensure a living countryside for village communities, recreational activities and rural enterprises. Green belt is being lost in Dacorum as farmers sell off their land to developers or change its use to non rural activities. There is no presumption to protect and conserve in this plan and no criteria on which a defence against this loss can be mounted. Exceptional circumstances are just another way of saying opportunity.
Included files	
Title	Managing Development in the Countryside
ID	EGS2607
Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>The Plan calls for significant development on Green Belt land but is silent on the full extent of that development which has been estimated by CPRE at 746 hectares. The use of Green Belt land is contrary to the wishes of our community as was overwhelmingly expressed in the responses to the 2017 consultation where nearly 95% of respondents didn't agree with the proposed approach to Green Belt and Major Development sites. It is clear from Cllr Williams' letter of 30th November 2020 to the Secretary of State that the Borough Council recognises that the same concerns are likely to arise again from the current consultation.</p> <p>Development on Green Belt land also runs counter to the Government's response to the local housing need proposals of 16th December 2020 in which it stated "... <i>that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places</i>". We also understand that one of the reasons that the Inspectors halted the Public Examination of the St Albans Local Plan was its over-reliance on a few very large strategic Green Belt allocations. Finally we see insufficient evidence that Dacorum has looked widely enough to meet its housing commitments from less sensitive, more sustainable, sites.</p>

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

Included files

Title Managing Development in the Countryside

ID EGS2725

Person ID 1263254

Full Name Teresa Finnigan

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Managing Development in the Countryside comment No to building in GB end of, not enough to justify its removal and certainly no to the coalence with Redbourn that would surely happen if this was to be approved. Hemel should be at least a mile from Redbourn!

Included files

Title Managing Development in the Countryside

ID EGS2776

Person ID 1262722

Full Name Colin McCready

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

Yes

* No	
Managing Development in the Countryside comment	Removing greenbelt land to sell to developers cashing in on over inflated demand expectations in no way protects the countryside.
Included files	
Title	Managing Development in the Countryside
ID	EGS2851
Person ID	1263198
Full Name	Jillian Hipson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	19.8 There is no need for inappropriate development in the Green Belt. Once this countryside has been built on, it is gone forever. Please concentrate on brownfield sites and areas which are NOT Green Belt.
Included files	
Title	Managing Development in the Countryside
ID	EGS2858
Person ID	1263104
Full Name	charlotte grange
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Managing Development in the Countryside comment	As with many other commenters here, I am fully against the huge scale of the proposed development, on account of sustainability, personal health and the health of our communities, and ecology. There have been continual mentions that biodiversity would be 'improved' through development - this is incredibly vague and not encouraging in the current time of climate disaster. Covid has taught us that our local countryside is more important than ever - I have personally seen huge increases in footfall in areas like Ashridge and other countryside areas that adjoin our towns - much of which would be destroyed under this current plan. The current plan fully runs against the Chilterns Conservation Board Management Plan 2019-24 and will see a huge increase in pollution from construction and personal vehicles, and will see the quiet country town nature of places like Tring and Berkhamsted entirely changed for the worse. I appreciate that the net zero carbon emissions target of 2035 is mentioned, however I find it hard to see real evidence of actual adherence to this target with this emphasis on unsustainable growth. I would like to see renewable energy solutions be brought to the forefront, and instead of proposing vast areas of urban settlement far to the excess of actual population growth figures from the ONS, I would like to see a renewed invigoration of the countryside, with the creation of more protected areas, and tree planting and meadow creation schemes. The relationship between residents and the surrounding environment is an important one which was strengthened during the lockdown as we looked to the fields beyond our houses for an escape from our homes. The countryside around Hemel is a hugely important resource for local residents, and to take this away is an ill thought and incredibly sad outcome for Dacorum.
Included files	
Title	Managing Development in the Countryside
ID	EGS2880
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	
Managing Development in the Countryside comment	

Included files	
Title	Managing Development in the Countryside
ID	EGS2933
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	It is very important the rural areas are preserved and managed. Hemel Hempstead is already virtually a suburb of London.
Included files	
Title	Managing Development in the Countryside
ID	EGS2954
Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I agree with Policy Sp11, DM39, DM40 and SP12 except for (4) where small scale should be defined better eg garden infilling.

19.16 I repeat an earlier comment that Northchurch is a village and Dudswell a hamlet and the communities are distinct and wish to remain separate from 'Great Berkhamsted'. Therefore should be classed as rural and semi rural environments with Green Belt protected to preserve the character and setting of these historic settlements and to safeguard from encroachment, not released for housing development or classified as urban. In other words, Northchurch should be added as villages to the 19.16 list and Dudswell would fall under section 19.17 to protect their intrinsic character from development

Included files

Title Managing Development in the Countryside

ID EGS2994

Person ID 1263478

Full Name ELIZABETH RAILTON

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Managing Development in the Countryside comment Managing Development in the Countryside: the proposals to build on the Green Belt are the most egregious aspect of the Local Plan and the proposition that “exceptional circumstances “ exist that allow land to be taken out of the Green Belt is not well evidenced. The Green Belt which has always been intended to prevent the outward spread of urban areas into the countryside is a vital contributor to the attraction of and quality of life in this part of Hertfordshire. The proposed erosion of the belt through these plans is a totally disproportionate response to what appear to be housing developer led targets for the Dacorum area particularly in relation to the smaller towns.

It is notable that the calculations of housing numbers required were developed during 2018 and 2019 before the Covid-19 pandemic threatened the identity of Dacorum as a substantial commuter area linked to London by the West Coast railway line that runs through the borough. An element of commuting may we'll return post pandemic but there is a considerable body of opinion that regards an element of remote working as here to stay. This gives people realistic options for buying more affordable properties in other areas.

Included files

Title Managing Development in the Countryside

ID	EGS3232
Person ID	1263566
Full Name	Frances Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	There should be no further development in what remains of our countryside and specifically no infilling and edge of village development
Included files	
Title	Managing Development in the Countryside
ID	EGS3279
Person ID	1262255
Full Name	AJ W
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	19.5 Rather disingenuous statements used where DBC mention the NPPF's five key purposes of the Green Belt and explains "The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 136)." What is missed from this is the following words 'where exceptional circumstances are fully evidenced and justified'. I do not, as I hope is highlighted, believe that the requirement has been fully evidenced and justified. The government and indeed the incumbent PM have made it clear that Green Belt should be afforded the highest protection. DBC are failing Berkhamsted town and the electorate.

Included files	
Title	Managing Development in the Countryside
ID	EGS3366
Person ID	1263693
Full Name	Ruth Colderwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Too many green spaces are being used
Included files	
Title	Managing Development in the Countryside
ID	EGS3382
Person ID	1261609
Full Name	DEBORAH CROOKS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	

Title	Managing Development in the Countryside
ID	EGS3383
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	

Title	Managing Development in the Countryside
ID	EGS3425
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	No Comment
Included files	

Title	Managing Development in the Countryside
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ID	EGS3446
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The Government has made it clear that numbers are not targets and that Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a local plan where exceptional circumstances are fully justified. I cannot understand why DBC cannot make a case that can be robustly justified.
Included files	
Title	Managing Development in the Countryside
ID	EGS3476
Person ID	1263804
Full Name	Vicky Hewlett
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I oppose any building on greenbelt land. It should be protected for our future generations- once it's lost, it's gone forever.
Included files	
Title	Managing Development in the Countryside

ID	EGS3507
Person ID	1263810
Full Name	David Tolfree
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The rural villages cannot cope with much additional development due to the infrastructure they do not have
Included files	
Title	Managing Development in the Countryside
ID	EGS3539
Person ID	1263821
Full Name	Anne Isherwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS3590

Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	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.
Included files	
Title	Managing Development in the Countryside
ID	EGS3611
Person ID	1263865
Full Name	Robin McMorran
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	"The Green Belt boundary has been reviewed" - weasel words. What you really mean is "the Tory government has decided to trash the green belt and concrete over lots of fields".
Included files	
Title	Managing Development in the Countryside

ID	EGS3659
Person ID	222269
Full Name	Georgina Tregoning
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I do not believe the housing need justifies the loss of Green Belt, especially between Tring and Tring Station.
Included files	
Title	Managing Development in the Countryside
ID	EGS3721
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	Outdated, houses not needed and destroying the green belt is not the right way to do it
Included files	
Title	Managing Development in the Countryside
ID	EGS3731

Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	They are planning to build on farmland and beautiful countryside which will be lost forever in the area of Chiltern AONB.
Included files	
Title	Managing Development in the Countryside
ID	EGS3792
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	This plan destroys the greenbelt. It works against everything we want and actually need. Focus on redeveloping inner cities or heavy urban areas that need investment and help. Instead of spreading out over what little is left of the countryside. Save the greenbelt - when you've built on it, it will be gone. FOREVER.
Included files	
Title	Managing Development in the Countryside
ID	EGS3875

Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	You are ruining the countryside by putting up new housing
Included files	
Title	Managing Development in the Countryside
ID	EGS3880
Person ID	1263924
Full Name	Susan Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The countryside should not be developed except to provide footpaths and cycle paths.
Included files	
Title	Managing Development in the Countryside
ID	EGS3943
Person ID	1264025

Full Name	Caroline Sherwen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	What are the exceptional circumstances that justify building on the green belt? I agree completely with the purpose of the green belt as outlined by the NPPF here, and this plan contradicts those aims.
Included files	
Title	Managing Development in the Countryside
ID	EGS3973
Person ID	1263440
Full Name	J Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS3980
Person ID	1261840
Full Name	Rachel Heath

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS4003
Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	SP11 - Not convinced the reasoning to build within the green built is exceptional.
Included files	
Title	Managing Development in the Countryside
ID	EGS4027
Person ID	1207786
Full Name	Anne Foster

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>SP11</p> <p>The NPPF states that <i>Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 136) where exceptional circumstances are fully evidenced and justified</i>".</p> <p>The only justification found in the plan for development on Greenbelt is to meet unjustified housing numbers and the government specifically says that this is not a valid reason.</p> <p>DBC has shied away from making the robust challenge required to challenge the government imposed housing numbers, even though the government's own statements and policies on preservation of the green belt would support such an action</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS4068
Person ID	1263883
Full Name	New Gospel Hall Trust
Organisation Details	New Gospel Hall Trust
Agent ID	1263872
Agent Name	John john.shephard@jjdesign.org.uk
Agent Organisation	
Yes / No * Yes * No	Yes

Managing Development in the Countryside comment	New Gospel Hall Trust welcomes and supports the proposed provisions of Policy SP12 – Development in the Rural Area which include support for social, community and leisure uses. This is supported by National Planning Policy Framework paragraph 83, which recognises the need for planning policies to enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
Included files	
Title	Managing Development in the Countryside
ID	EGS4083
Person ID	1259583
Full Name	Marc Best
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Doesn't seem the Countryside development is being managed at all. The Green Belt must be protected otherwise there is no point in having classified it in the first place. It is up to the council to protect this space. If you let this happen you are setting a precedent for future destruction of green spaces
Included files	
Title	Managing Development in the Countryside
ID	EGS4113
Person ID	1264210
Full Name	Fiona Fulford
Organisation Details	myself
Agent ID	1264200
Agent Name	Fiona Fulford

Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>I do not believe that this plan meets the special circumstances for development of the green belt. The green belt in question borders the valuable Chiltern Beeches SAC and AONB and the additional population will put enormous strain on these areas and such I understand is not permitted. The 2019 DEFRA Glover report recommends that the Chilterns be considered as the UK's next national park - this is incompatible with these development proposals and the extent of green belt development.</p> <p>In addition the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS4147
Person ID	1262892
Full Name	Jean Farrer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I refer you to the One Voice Alliance whose submissions I support. Please reconsider the use of Green Belt in favour of the reuse of unnecessary office/retail space.
Included files	
Title	Managing Development in the Countryside
ID	EGS4185
Person ID	1145844

Full Name	Dr and Mrs Melvyn Else
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS4210
Person ID	1264311
Full Name	Simon Andrews
Organisation Details	DLA Town Planning
Agent ID	1263613
Agent Name	Simon Andrews
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Policy DM39 sets out the Council's intended policy in respect of limited infilling in Green Belt villages. However, the intended policy is not consistent with government policy in the NPPF and on this basis is not sound. The NPPF (paragraph 145e) allows "limited infilling in villages". Infilling isn't defined, nor "limited", nor "villages". While the Council may wish to set out its understanding of what these terms mean, to give such a definition Development Plan status is inappropriate. The result is that the Local Plan prevents development that would be allowed under the NPPF. This sets the Local Plan in conflict with the NPPF and prevents it being found sound.</p> <p>Inspectors have allowed infill developments in villages other than the four listed in draft Policy DM39, meaning that such development was considered to be consistent with the NPPF.</p>

Many of the villages in the Borough have been provided with a village boundary on the draft policies map, which demonstrates that they do have the necessary cohesiveness, contrary to paragraph 19.17 (first bullet).
 The Council's interpretation of these terms should be set out elsewhere and in the form of guidance, not policy.
 Policy DM39 should be deleted in its entirety. National policy is sufficient to guide development proposals on this issue.

Included files

Title Managing Development in the Countryside

ID EGS4264

Person ID 1264269

Full Name Paul de Hoest

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

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

Included files

Title Managing Development in the Countryside

ID EGS4266

Person ID 1261915

Full Name Eleanor Lovett

Organisation Details Landhold Capital

Agent ID 1261754

Agent Name	Eleanor Lovett
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Landhold Capital considers that the Council's Green Belt Topic paper clearly establishes the exceptional circumstances that justify the release of land from the Green Belt. This Paper confirms that it is not possible to fulfil the Borough's housing needs through the other options suggested in paragraph 137 of the Framework, namely utilising brownfield land, optimising densities, and seeking assistance from neighbouring authorities. Furthermore, the current Core Strategy was adopted on the condition that a review of Green Belt boundaries would be required to ensure that the Borough could meet its need for the plan period up to 2031. The paper establishes that the most sustainable strategy for delivering development in the Borough is at towns and villages that are inset from the Green Belt, which has informed the preparation of this plan and the spatial strategy.</p> <p>In terms of the spatial strategy proposed and the distribution of Green Belt release sought by this Plan, Landhold Capital is concerned that the Council has not fully taken into consideration all the requirements of the Framework. In particular, it is noted that paragraph 138 of the Framework establishes that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. These provisions do not appear to have been reflected in the Council's decision-making with regards to the release of Green Belt in the Borough, as locations such as Kings Langley which is served by an existing train station should have featured more in the spatial strategy, with more land proposed for release from the Green Belt and allocated for development. Landhold Capital does not consider that the Council has reflected this guidance in its approach to determining the spatial strategy for this Plan, as it does not appear to differentiate between the large villages despite Kings Langley benefiting from a train station unlike Bovingdon or Markyate.</p> <p>Furthermore, seeking to release land from the Green Belt from the Green Belt to the west of Kings Langley through this plan would have the additional benefit of creating a more defensible boundary by using the route of the A41 which is an identifiable, physical feature, of permanence as advocated by the Framework at Paragraph 139. This would allow expansion of Kings Langley through this plan period to meet the Borough's housing needs and importantly the local needs for affordable housing, as well as helping to secure a defensible boundary to the Green Belt in the longer term.</p> <p>The Council's approach to releasing land from the Green Belt should also be given further consideration, in light of the need to plan for an increased housing requirement compared to that which is proposed through this draft of the Plan. Whilst there may be limited opportunities to identify other sites to meet this need that does not involve the release of the Green Belt, Landhold Capital considers that the Council should strongly consider the role that Kings Langley could play in accommodating further growth in a sustainable way. The settlement has been identified as one of the more sustainable villages in the Borough, with parts of the surrounding Green Belt not considered to strongly contribute to the purposes of the Green Belt. The Council should also recognise the importance of securing enough Green Belt release through</p>

this emerging Plan to ensure that the Borough's housing needs can be met in full for this plan period and beyond, as the Framework makes it clear in Paragraph 136 that changes to boundaries should have regard to their intended permanence so they can endure beyond the plan period, whilst Paragraph 139 goes on to require plans to be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

In order for Policy SP11 and the emerging Plan as a whole to be sound and consistent with national policy, it is considered that the Council should reconsider the boundaries to the Green Belt and in particular at Kings Langley, recognising the need to allocate further sites in order to meet the housing requirement in full during this plan period and avoid the need to make further modifications to the Green Belt boundaries within this plan period and beyond.

Included files

Title Managing Development in the Countryside

ID EGS4309

Person ID 1144948

Full Name Mr Peter Brown

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Managing Development in the Countryside comment The NPPF makes clear that there will be a general presumption against inappropriate development within the Green Belt unless very special circumstances exist. The plan fails to provide any substantial evidence that such special circumstances exist. The Green Belt Review that was carried out was very subjective and was considered inaccurate by most local groups.

Included files

Title Managing Development in the Countryside

ID EGS4319

Person ID 1264321

Full Name David' Fox

Organisation Details personal

Agent ID	1264318
Agent Name	David Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I do not believe that this plan meets the special circumstances for development of the green belt. The green belt in question borders the valuable Chiltern Beeches SAC and AONB and the resulting additional population will put enormous strain on these areas and as such I understand is not permitted. The 2019 DEFRA Glover report recommended that the Chilterns be considered as the UK's next national park - this is incompatible with these development proposals and the extent of green belt development. In addition, the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.
Included files	
Title	Managing Development in the Countryside
ID	EGS4336
Person ID	1264325
Full Name	Olivia Halper
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside

ID	EGS4406
Person ID	1264312
Full Name	Angela Delglyn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	It has become evident over the increased need for local walking space that if the size of Tring is to increase to such an extent, that careful management of the surrounding areas will be required. The increased footfall and wet weather has 'trashed' many a footpath, and I suspect it will be a long while before the grass grows back. Double this effect without tending to the surrounding areas, and the area may not look so good in a few years time, or be such a pleasant place to live and walk in.
Included files	
Title	Managing Development in the Countryside
ID	EGS4414
Person ID	1264062
Full Name	James Metcalfe
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I am unhappy with the amount of green belt land being built on.
Included files	

Title	Managing Development in the Countryside
ID	EGS4462
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS4486
Person ID	1264398
Full Name	Caroline Merritt
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Too many houses planned for Markyate. There's not enough parking. The school and gp will not cope with the extra residents. The roads in and out the village will get congested and cause issues into the a5. the electricity supply already has multiple black outs on a regular basis. Extra housing is going to cause further issues.

Included files	
Title	Managing Development in the Countryside
ID	EGS4512
Person ID	1264374
Full Name	Belinda Hunt
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Development in the countryside cannot be blanket housing schemes. If local villages have on average 1500 residents then adding housing for a further 3400 families in the valley between is non sensical. Additional housing must provide education, retail, leisure, community services for additional citizens. The country lanes currently cannot take more traffic. Water, telecomms, sewerage infrastucture is equally in disrepair and cannot take on the current new loads. The villages in Bucks and Beds bordering Dacorum cannot take the load from Aylesbury and MK let alone new loads from HH.
Included files	
Title	Managing Development in the Countryside
ID	EGS4531
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No

Managing Development in the Countryside 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 Managing Development in the Countryside

ID EGS4583

Person ID 1145918

Full Name Mr Richard Tregoning

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment It may be your policy to only develop without touching Greenbelt etc but this does not stop your destruction of a large part of Rural Tring which would be entirely unnecessary if the plan was changed to reflect actual population growth of

4.7 %. Tring is set to expand by 55% and have green belt taken. This is entirely unnecessary if the plan is withdrawn and realistic growth is inserted

Included files

Title Managing Development in the Countryside

ID EGS4707

Person ID 1263004

Full Name Jill Townsend

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment The plan states
'Green Belt land has been released to enable the delivery of the spatial strategy for Dacorum'.
It is unacceptable that Green Belt land is seen to be 'available' to be sacrificed in this way. Concreting on Green Belt land should not be countenanced for the 'greater good' of the rest of the Borough.

Included files

Title Managing Development in the Countryside

ID EGS4811

Person ID 1264475

Full Name Simon Davies

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Managing Development in the Countryside comment	The Green Belt seems to offer no protection against the interpretation of the word 'exceptional'. I oppose your use of the word in this case.
Included files	
Title	Managing Development in the Countryside
ID	EGS4880
Person ID	1264524
Full Name	Karen Kang
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS4977
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent ID	1264539
Agent Name	Bethan Fox
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Managing Development in the Countryside comment	<p>I do not believe that this plan meets the special circumstances for development of the green belt. The green belt in question borders the valuable Chiltern Beeches SAC and AONB and the resulting additional population will put enormous strain on these areas and as such I understand is not permitted. The 2019 DEFRA Glover report recommended that the Chilterns be considered as the UK's next national park - this is incompatible with these development proposals and the extent of green belt development.</p> <p>In addition, the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS5063
Person ID	1264258
Full Name	Fintan FitzPatrick
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS5102
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 * No	Yes
Managing Development in the Countryside comment	I object fundamentally to the general re-drawing of the Green Belt boundary implied by SP11. Green Belt should be permanent and not regarded merely as a land bank to satisfy developers. I do not agree that Aldbury should see development under SP12, since it occupies a very special and particular landscape setting in the Chilterns AONB.
Included files	
Title	Managing Development in the Countryside
ID	EGS5134
Person ID	1264550
Full Name	Kevin Fielding
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	There seems to be a belief in this document that Town dwellers do not have access and use the countryside. To quote: "the Plan needs to find a balance between restraint and ensuring a "living countryside" for village communities" This should read "the Plan needs to find a balance between restraint and ensuring a "living countryside" for all dacorum communities" With this change in place, you will be clear how this balance is not being struck when considering many of the greenfield developments around Hemel, Berkhamsted and Tring as these developments will be depriving current town dwellers of their access to "living countryside"
Included files	

Title	Managing Development in the Countryside
ID	EGS5141
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Managing Development in the Countryside</p> <p>There is no justification to occupy Green Belt, when housing need has been over estimated by 40%. I am opposed to building in the Green Belt and AONB which once built over it can never be reversed.</p> <p>The laws of protection of the Countryside from greedy developers are weak and are constantly being exploited.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS5170
Person ID	1264509
Full Name	Hannah Fox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I do not believe that this plan meets the special circumstances for development of the green belt. The green belt in question borders the valuable Chiltern Beeches SAC and AONB and the resulting additional population will put enormous strain on these areas and

as such I understand is not permitted. The 2019 DEFRA Glover report recommended that the Chilterns be considered as the UK's next national park - this is incompatible with these development proposals and the extent of green belt development.

In addition, the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.

Included files

Title Managing Development in the Countryside

ID EGS5203

Person ID 1264593

Full Name Rebecca Mackenzie

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment In what way are these Exceptional Circumstances? I do not perceived anything exceptional in these circumstances.

Included files

Title Managing Development in the Countryside

ID EGS5226

Person ID 1264608

Full Name Nicola Beadle

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Managing Development in the Countryside comment	<p>I do not believe that this plan meets the special circumstances for development of the green belt. The green belt in question borders the valuable Chiltern Beeches SAC and AONB and the resulting additional population will put enormous strain on these areas and as such I understand is not permitted. The 2019 DEFRA Glover report recommended that the Chilterns be considered as the UK's next national park - this is incompatible with these development proposals and the extent of green belt development.</p> <p>In addition, the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS5291
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS5336
Person ID	1264616
Full Name	Philip Daw
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS5370
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>I do not believe that this plan meets the special circumstances for development of the green belt. The green belt in question borders the valuable Chiltern Beeches SAC and AONB and the resulting additional population will put enormous strain on these areas and as such I understand is not permitted. The 2019 DEFRA Glover report recommended that the Chilterns be considered as the UK's next national park - this is incompatible with these development proposals and the extent of green belt development.</p> <p>In addition, the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Managing Development in the Countryside

ID	EGS5477
Person ID	1264648
Full Name	Lydia Whelan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	I understand the principles of the management of the countryside strategy but let's not forget that the development of huge new neighbourhoods and the infrastructure they require will create huge losses too and leave our areas of outstanding beauty and wildlife under more pressure with more people wanting to escape to the country. Lets not wreck the environment. It is vital to do everything we can to mitigate against environment damage and climate change
Included files	
Title	Managing Development in the Countryside
ID	EGS5484
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	'The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances' Exceptional circumstances means just that. Brown Fields must be built on first and only when these options are exhausted should green belt be built on. With covid, Brexit and the economic downturn housing need may change.

Included files	
Title	Managing Development in the Countryside
ID	EGS5486
Person ID	1264647
Full Name	Richard Burnell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Use redundant brownfield areas before developing the countryside.
Included files	
Title	Managing Development in the Countryside
ID	EGS5546
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	

Title	Managing Development in the Countryside
ID	EGS5582
Person ID	1264363
Full Name	Roselyn King
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I do not feel that there are exceptional circumstances which justify the removal of land from the Green Belt so housing can be built in North and East Hemel. The Government could and should acknowledge the particularly high amount of Green Belt and AONB land in Dacorum and reduce its demands for new housing in our borough so that the land in North and East Hemel can remain in the Green Belt. The CPRE has demonstrated that the Government could build sufficient housing elsewhere.
Included files	
Title	Managing Development in the Countryside
ID	EGS5652
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The need for more housing does not constitute an "exceptional circumstance" as defined by the NPPF.

The loss of 850 hectares will result in over development and will damage the AONB. As you say 60% of DBC is Green Belt and 33% " of the countryside is within the Chilterns AONB" . This will be damaged irreparably if there is a 24% in housing in these areas. An increase in housing brings increase in population of DBC and this would put even greater pressure on the green spaces and countryside in our borough.

Included files

Title Managing Development in the Countryside

ID EGS5673

Person ID 1262957

Full Name Gregory Hukins

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Managing Development in the Countryside comment In my previous comments I have pointed out that the plots of land proposed for development in Berkhamsted and Tring are not sustainable development and they fly in the face of 19.2.

Included files

Title Managing Development in the Countryside

ID EGS5677

Person ID 1144878

Full Name Mr Peter Moore

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Managing Development in the Countryside comment	There are no exceptional circumstances to develop on green belt land. To do so wholly contradicts Section 18 of the Plan.
Included files	
Title	Managing Development in the Countryside
ID	EGS5686
Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Managing Development in the Countryside comment	<p>This section is of great concern. It is here that DBC tries to 'justify' large-scale destruction of the Green Belt and has created its own interpretation of 'exceptional circumstances' - presenting a confusing and incomplete policy.</p> <p>I entirely support the points that BRAG has made and am therefore including them here:</p> <p>In paragraph 19.5 it lays out the NPPF's five key purposes of the Green Belt. And then in 19.6 explains "The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 136)." But critical NPPF text is omitted that states "where exceptional circumstances are fully evidenced and justified".</p> <p>19.6 does continue "In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries. The Sustainable Development Strategy sets out these challenges and establishes why a planned review of Green Belt Boundaries is justified to meet development needs." And again in 19.7 "We explore the justification for this in the 'Sustainable Development Strategy' chapter of the Plan."</p> <p>However, section 4 is titled 'Sustainable Development in Dacorum' and it spans just a single page (two if you count the map) of this 368-page document, while containing only 3 numbered paragraphs and one policy SP1. BRAG cannot discuss either the evidence or justification because nothing on that page resembles evidence or justification.</p>

BRAG has dug deeper into the myriad of supporting evidence documents and can only find DBC's assertion that the Government's 922dpa housing 'need' assessment must be accepted as a target as justification for the Green Belt releases. DBC's argument being "Any option below the standard methodology would have to be robustly justified" (paragraph 5.8 of The Development Strategy Background Topic Paper).

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

DBC seem to have mis-understood their responsibilities. Paragraph 136 of the NPPF is clear 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified', and not the other way round. Paragraph 1 of Policy SP11 is badly written, in particular the sentence "The Green Belt boundary has been reviewed to land in defined Growth Areas to meet identified need over the lifetime of the Plan and to allow for other minor consequential changes."

BRAG is unsure of the exact meaning of this sentence, but it could be construed that the Green Belt boundaries changes proposed are minor. They are most definitely not – Berkhamsted's urban footprint will increase by a massive 31%.

Included files

Title Managing Development in the Countryside

ID EGS5871

Person ID 1264752

Full Name Chris Brown

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment

The need for more housing does not constitute an "exceptional circumstance" as defined by the NPPF.

The loss of 850 hectares will result in over development and will damage the AONB. As you say 60% of DBC is Green Belt and 33% " of the countryside is within the Chilterns AONB" . This will be damaged irreparably if there is a 24% in housing in these areas.

An increase in housing brings increase in population of DBC and this would put even greater pressure on the green spaces and countryside in our borough. My earlier comments highlight the fundamental failure of this Local Plan to meet its objectives or meet the needs of its residents.

Included files	
Title	Managing Development in the Countryside
ID	EGS5887
Person ID	1264354
Full Name	Juliet Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>I do not believe that this plan meets the special circumstances for development of the green belt. The green belt in question borders the valuable Chiltern Beeches SAC and AONB and the resulting additional population will put enormous strain on these areas and as such I understand is not permitted. The 2019 DEFRA Glover report recommended that the Chilterns be considered as the UK's next national park - this is incompatible with these development proposals and the extent of green belt development.</p> <p>In addition, the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS5975
Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Greenbelt in section 19.5, has some very valuable definitions which will all be broken should development outside of the current boundaries be allowed in Tring. The barrier to the AONB will no longer exist, and the character of the town will be lost due to the proposed increase in size.
Included files	
Title	Managing Development in the Countryside
ID	EGS5980
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The green belt boundaries can only be altered in exceptional circumstances (paragraph 16) but the alleged exceptional circumstances are not properly justified or explained. The government target for housing should not be exceptional circumstances. The proposals make massive changes to the green belt boundaries, increasing Tring and Berkhamsted by huge percentages.
Included files	
Title	Managing Development in the Countryside
ID	EGS6039
Person ID	1264824
Full Name	Anne Pattinson
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The majority of the growth in Tring seems to be on Greenbelt land and, as such, will intrinsically change the town itself. Remvoing this much open space and filling it with manmade structures will only serve to alter the look of the place, but more importantly will impact the countryside and the rural nature of Tring.
Included files	
Title	Managing Development in the Countryside
ID	EGS6110
Person ID	1264816
Full Name	Christopher Nicholls
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The use of farmland is bad for the environment and does not in any way support biodiversity.
Included files	
Title	Managing Development in the Countryside
ID	EGS6119
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS6200
Person ID	1264872
Full Name	Ben Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>I do not believe that this plan meets the special circumstances for development of the green belt. The green belt in question borders the valuable Chiltern Beeches SAC and AONB and the resulting additional population will put enormous strain on these areas and as such I understand is not permitted. The 2019 DEFRA Glover report recommended that the Chilterns be considered as the UK's next national park - this is incompatible with these development proposals and the extent of green belt development.</p> <p>In addition, the Thakeham/ Broxbourne proposed development which is in addition to the housing development plan under consideration here will complete an urban conurbation from Northchurch to Kings Langley, destroying any wildlife corridors along this strip, which also goes against any 'special circumstances' for developing green belt.</p>
Included files	
Title	Managing Development in the Countryside

ID	EGS6223
Person ID	1261819
Full Name	Alex Rathmell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS6256
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	There is a lack of evidence from the council to support the claim that there are 'exceptional circumstances' that require changing Green Belt boundaries.
Included files	
Title	Managing Development in the Countryside
ID	EGS6271

Person ID	1264030
Full Name	Sean Collier
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	19.5.1 seems to be the opposite of what is happening. I am concerned that if the Green Belt is amended now, nothing is to stop further encroachment into the land and developing large towns.
Included files	
Title	Managing Development in the Countryside
ID	EGS6392
Person ID	1262933
Full Name	James Cunningham
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	This plan fails to do the following: <ol style="list-style-type: none"> 1 to check the unrestricted sprawl of large built-up areas; 2 to prevent neighbouring towns merging into one another; 3 to assist in safeguarding the countryside from encroachment; 4 to preserve the setting and special character of historic towns; and 5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Included files	

Title	Managing Development in the Countryside
ID	EGS6401
Person ID	1264944
Full Name	Anna Sewerniak
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	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.
Included files	
Title	Managing Development in the Countryside
ID	EGS6433
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Restraint on unsustainable development in the countryside is not the experience of Bourne End and we feel forgotten when we point to policy that seeks to protect our countryside setting while allowing unsuitable development in our fields

accessed by our little lanes. Who would have thought Dog Day Care would be allowed to fence off into smaller sections a wide arable field with a structure in each sector and provide hard standing for 20 vans and a container adjacent to a barn with central heating, all with a business plan that transports animals from as far away as London every day?

We seek real enforcement to check the unrestricted sprawl of large built up areas. The Garden Town plans have not been continued in the proposals for LA3 West Hemel Hempstead and it looks like the same mistakes are being made with the Gade Valley.

Included files

Title Managing Development in the Countryside

ID EGS6484

Person ID 1264936

Full Name Jane Cracknell

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment Green Belt should be protected and it is vital that Berkhamsted does not sprawl beyond its current boundaries.

Included files

Title Managing Development in the Countryside

ID EGS6494

Person ID 1264977

Full Name E Ling

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<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>The proposed Tring housing areas are chalkland which has many unique hydrogeological characteristics that make it particularly prone to groundwater flooding. This could give many problems for the Town.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS6518
Person ID	1260255
Full Name	KTB Commercial
Organisation Details	
Agent ID	1260252
Agent Name	Peter Biggs
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Paragraphs 19.13 to 19.21 and Policy DM39 provide further detail of how the Council defines “Selected Small Villages” in the Green Belt.</p> <p>Paragraph 19.16 identifies Chipperfield, Flamstead, Potten End and Wigginton within the Green Belt as selected smaller villages. Paragraph 19.17 goes on to state that other settlements and hamlets in the Borough are not considered to constitute villages.</p> <p>It is worth noting that whilst the Council make this statement in Paragraph 19.17, elsewhere within the Plan “Other small villages” are referred to, for example, within Table 1: Settlement Hierarchy.</p> <p>The Council therefore appear to contradict themselves within the Plan as to what is and what is not a village.</p>

Paragraph 19.17 seeks to provide a further guidance as to how the Council has classed a settlement as a village and sets out 4 criteria:

- they do not have the necessary cohesiveness to justify a boundary;
- they do not contain enough key services and infrastructure to warrant settlement status;
- they simply form the ribbon development of adjoining larger settlements; or
- in order to protect their intrinsic character from development.

In the case of Piccotts End, the Council's Proposal Map provides a settlement boundary around what is considered by the Council to be the settlement edge. As such, this complies with the first criteria in that a sense of cohesiveness within the settlement. Piccotts End has a public house, a number of businesses, antique, bus stops along Piccotts End Road, and the historic Piccotts End Paintings. These businesses, services and tourist attractions distinguish the settlement at Piccotts End from others. It is also located in close proximity to both Hemel Hempstead and the planned Growth Area of Hemel North. As such, it complies with the second criteria set out in Paragraph 19.17.

Piccott End itself cannot be classed as a form of ribbon development. It has a historic street forming a back bone to the village, with more recent development at either end. Although it is in close proximity to Hemel Hempstead, it does not adjoin the larger settlement, and has its own village identity. The third criteria therefore does not apply to Piccotts End.

The fourth criteria should not be used to define what is considered to be a village or not.

Other policies within the Local Plan will seek to protect heritage assets and Conservation Area, and it should not be the role of policy DM39 to prevent development within these areas as a matter of principle. It should also be noted that not all of Piccotts End is located within a Conservation Area, including the site at Rainbow and land north of Rainbow, Piccotts End Land. It is therefore considered that the fourth criteria is not relevant to considering what is and what is not classed as a village.

It is noted that this criterion for defining a village is taken from the Council's Settlement Hierarchy Study Main Report October 2017. It was at this stage the Council took the view not to consider settlements, such as Piccotts End, as a village for planning purposes. However, Piccotts End clearly has attributes of a village, in that it has a number of businesses providing employment opportunities, including the Marchmont Farm workshops, a metal fabrication firm, antique shop, and a fencing and landscaping company based within the village. All of these would have been classed as a higher-order service within the 2017 report, if Piccotts End had been included in the review. The village also has The Marchmont Arms public house at its southern end, which would have been scored as a key service within the 2017 report.

The 2017 Hierarchy report also considers accessibility. Piccotts End has number of bus stops through the village along Piccotts End Road; there is a bus service that provides a direct route into Hemel Hempstead; the bus service runs Monday to Friday and after 9am; and there are fewer than 10 trains/buses per day. The 2017 Hierarchy report would have scored this level of bus service provision as limited, but as the village is within 5 km of Hemel Hempstead it would have been scored overall a Low Accessibility rating.

Based on this scoring and assessment of the settlement structure, at the very least Piccotts End should have been classed as a village. This assessment also does not take into account the proximity of the new service and facilities that will be provided at North Hemel Garden Community.

As such, Policy DM39 should be amended to recognise the opportunity that villages such as Piccotts End can provide in terms of delivering sympathetic high quality development. It is also proposed that the settlement boundary of Piccotts End should be amended to include the parcel of land to the north of Rainbow, Piccotts End Lane.

A housing allocation site is proposed at Rainbow, Piccotts End Lane, and including land to the north of Rainbow, for up to 10 dwellings. The overall site area is 0.45 hectares. Taking into account the size and shape of this site at Piccotts End Lane, and other considerations such as trees and landscaping, impact on neighbours and character and appearance of the area, and providing parking and garden areas, this site could have a capacity up to 10 dwellings.

This site including Rainbow and land to the north of Rainbow should therefore be included within the settlement boundary of the Piccotts End, and that Piccotts End should be classed as a village which allows, subject to other considerations and policy requirements, development within the village boundary.

Included files

[PCTe_SK_100_A Prop Site Layout.pdf](#)
[PCTe_SK_020_A Village Boundary.pdf](#)

Title

Managing Development in the Countryside

ID

EGS6590

Person ID

1264970

Full Name

Frankie Mitchell

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

Yes

* Yes

* No

Managing Development in the Countryside comment

I am very concerned that two fields adjacent to the Boxmoor Trust SSS1 (A41/A414 Two Waters junction) are to have industrial developements on them.

This will blight the view as cars drive into the town.

This will massively impact on the enjoyment of the adjacent SSI meadow , precious for its wild flowers as well as reducing the wildlife on the boundary hedgerows.

I strongly believe these fields should remain as managed meadow and incorporated into a nature reserve perhaps as part of Boxmoor Trust.

Included files

Title	Managing Development in the Countryside
ID	EGS6591
Person ID	1263380
Full Name	Martin Warden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	

Title	Managing Development in the Countryside
ID	EGS6605
Person ID	1264697
Full Name	Nicholas Wood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>All very good in theory. And all totally at odds with your plans to push the largest number of housing units on Dacorum that you possibly can, using figures that are based on out of date metrics pre Brexit and pre Covid.</p> <p>You state that green belt land can only be built upon ' in exceptional circumstances ', but those circumstances do not exist. Yet again I have to point out that your forecasts for housing need are based on figures that are 5 years old at least and ignore the following facts. 1 - it is estimated that 1.3M EU citizens have left them UK post Brexit and Covid. 2 - the</p>

home working revolution caused by Covid means there will be much less demand for housing in traditional commuter towns like Tring and Berkhamsted. 3 - vast swathes of town centres are going to come available for housing as physical retail is destroyed by online shopping. 4 - the end of EU free movement to the UK means population growth will be massively subdued. We do not need anywhere near the number of housing units you propose for Berkhamsted, and we certainly do not need to destroy so much Green Belt land.

I am a resident of Berkhamsted and that is the area I know best but speaking from my home town's experience your commitment to preserving the Green Belt locally is laughable.

Your draft plan fails the NPPF's five guiding lights in at least three areas. Firstly, as the Pouchen End development stretches Hemel westwards you propose massive green belt building sites around Hall Park extending Berkhamsted eastwards. The two towns are demonstrably merging. Secondly, the vast amounts of Green Belt you suggest is declassified to the south of Berkhamsted will not check the unrestricted sprawl of urban areas. To the contrary, by treating the Green Belt in such a cavalier way you are encouraging developers like Grand Union Investments to buy Green Belt land and push aggressively for its declassification as they have done mercilessly this last five years. Lastly, though DBC has stated ad nauseam its commitment to the 'special character of Berkhamsted as a valley town' you seem determined to build houses along almost all the southern edge of that valley. Green Belt land is precious, once it's gone, it's gone for ever. Please do not dispose of it so lightly!!

Included files

Title Managing Development in the Countryside

ID EGS6609

Person ID 1265007

Full Name Duncan Brown

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
 * Yes
 * No

Managing Development in the Countryside comment

Included files

Title Managing Development in the Countryside

ID	EGS6700
Person ID	1265019
Full Name	Yvonne Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I endorse the response of the chiltern countryside group
Included files	
Title	Managing Development in the Countryside
ID	EGS6774
Person ID	1264920
Full Name	Anna Wellings Purvis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I feel that too much Green Belt space is being used given that it changes the character of the area and it is not being replaced in Hemel Hempstead with more plants, vertical gardens etc. This is an attack on air quality and the green, open nature of Adeyfield.
Included files	
Title	Managing Development in the Countryside

ID	EGS6804
Person ID	1265036
Full Name	Tom Burrows
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	You are destroying green belt and wild life with these planned concrete jungles.
Included files	
Title	Managing Development in the Countryside
ID	EGS6820
Person ID	1261827
Full Name	Ian Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	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 response from the CCG
Included files	

Title	Managing Development in the Countryside
ID	EGS6918
Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Through a policy of allowing infill on a mix of green open spaces, and brownfield sites I don't believe Dacorum has control of the developments taking place. Developers rather than planners dictate the look and feel of disparate developments, with money and profit taking priority over a coherent plan to develop a unified feel.
Included files	
Title	Managing Development in the Countryside
ID	EGS6941
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	

Title	Managing Development in the Countryside
ID	EGS6980
Person ID	1265105
Full Name	Jonathan Tay
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	

Title	Managing Development in the Countryside
ID	EGS7059
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	I firmly believe that no development should happen on Green Belt land. If there is no option, then the number of houses that we're being asked to build is simply too much.
Included files	

Title	Managing Development in the Countryside
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ID	EGS7122
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The amount of Green Belt to be released is way too much. Only in the case of small areas of poor quality Green Belt , would I even consider releasing it.
Included files	
Title	Managing Development in the Countryside
ID	EGS7139
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate. A 55% increase in housing on huge areas of countryside in the Chilterns Areas of Outstanding Natural Beauty is an environmental travesty.
Included files	
Title	Managing Development in the Countryside

ID	EGS7188
Person ID	1265129
Full Name	Karen Foxwell-Moss
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	<p>I fail to see how any of the NPPF-established five key purposes of the Green Belt (below) is served by the proposed developments. The opposite of what the Green Belt land is there to achieve is what will result. There has been no justification of any exceptional circumstances which might make the removal of green belt land necessary or acceptable.</p> <ul style="list-style-type: none"> • to check the unrestricted sprawl of large built-up areas; • to prevent neighbouring towns merging into one another; • to assist in safeguarding the countryside from encroachment; • to preserve the setting and special character of historic towns; and • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Included files	
Title	Managing Development in the Countryside
ID	EGS7214
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Managing Development in the Countryside comment	You must look for alternatives to building on the Green Belt! We'll never get it back and it's exactly what the world needs right now more than anything!
Included files	
Title	Managing Development in the Countryside
ID	EGS7242
Person ID	1265171
Full Name	Rebecca Hadley
Organisation Details	
Agent ID	1265155
Agent Name	Becks Hadley
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>I have a comment with regards to the proposed new settlement site just outside Bucks and within the control of Dacorum Borough Council (up to 3,400 houses between Wingrave and Long Marston).</p> <p>I know this site has not been included in the local plan yet - but is in the draft local plan. Living in Wingrave, (neighbouring village to Long Marston but in Bucks) we have not heard about this proposed development until very recently - but must put forward our objections to this before the deadline for comment. Pls see below a summary of our objections.</p> <p>Transport: huge new infrastructure would be required and there would be serious impacts on traffic for Long Marston and Wingrave (Wingrave already has traffic issues due to recent development within the village itself).</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS7245
Person ID	1264956
Full Name	Caroline Heard

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS7550
Person ID	1160566
Full Name	Roger Welchman
Organisation Details	Associate AR Planning
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Support is expressed for policy SP11, in particular the support it expresses towards limited infilling in the selected small villages, including Potten End.</p> <p>Support is expressed for policy DM39. As confirmed in paragraph 19.14 of the Local Plan for the purposes of the policy village boundaries are not definitive in establishing whether a site falls in a village. To avoid confusion this should be made clear in the wording of the policy. It is recommended that criteria a of part 2 of the policy is amended as shown in bold italics, as follows:</p> <p>a. <i>an on the ground assessment of the site which shows that it lies within the envelope of a selected small village, which could include sites which lie beyond the defined settlement boundary.</i></p>

Included files	
Title	Managing Development in the Countryside
ID	EGS8184
Person ID	1266123
Full Name	Elizabeth Morris
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	Lack of adherence to Green Belt Restrictions. This 'strategy' goes against the principle of the Green Belt. A 'demand' for housing - based on 7-year old data - does not automatically change the Green Belt boundaries. Part of what makes this area special would be destroyed. The purpose of building houses and 'they will come' wouldn't work because people, especially after a year of being told to appreciate trees, water and the outdoors, will not have it with this plan of over-building, no water, no sewage support and no GPs.
Included files	
Title	Managing Development in the Countryside
ID	EGS8549
Person ID	211354
Full Name	Mrs Laura Sanderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Managing Development in the Countryside comment	Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I fail to understand why DBC Planning felt unable or unwilling to make a case for preserving the Green Belt. Shame on you.
Included files	
Title	Managing Development in the Countryside
ID	EGS8815
Person ID	1158356
Full Name	Colin Blundel
Organisation Details	Planning Officer Chiltern Society
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Policy SP11 - Development in the Green Belt – The Plan needs to be much more explicit as to how the Council has demonstrated ‘exceptional circumstances’ for removing land from the Green Belt to allow for development. One of the main purposes of the Green Belt is to prevent urban areas expanding into the open countryside. This Plan has all the main urban areas expanding into open countryside. The need for additional housing does not on its own create an exceptional circumstance for allowing development in the Green Belt. The fact that the areas adjacent to settlements provide green space and a quality environment for local residents should weigh heavily against changing the Green Belt boundaries. Most are within the setting of the Chilterns AONB. National housing targets are very unclear at the moment, and boroughs such as Dacorum should be expected to provide less housing than more built up and less protected areas elsewhere in the region and nationally. These figures and the proposed sites must be reviewed when the methodology for assessing housing numbers has been revised.</p> <p>Policy SP12 - Development in the Rural Area - The Society supports this policy.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS9157

Person ID	211352
Full Name	Mr Andrew Sanderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Yes I have comments</p> <p>Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I fail to understand why DBC Planning felt unable or unwilling to make a case for preserving the Green Belt that can be “robustly justified”.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS9679
Person ID	1267468
Full Name	Chris Berry
Organisation Details	CPRE Hertfordshire
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	<p>Chapter 19 on development in the countryside wrongly omits any reference to 'openness' as being one of the two key characteristics of the Green Belt that national policy seeks to protect. This is a serious omission because it is this section of the Plan that will be used to manage individual development proposals, and harm to openness must be a primary consideration when the Council is determining such proposals, not just the five defined 'purposes' of the Green Belt.</p>

Paragraph 19.11 is wrong to facilitate any development on sites 'washed-over' by Green Belt. Exceptional circumstances have to be demonstrated for proposals in the Green Belt in the Plan, and 'very special circumstances' must be shown to permit planning applications for inappropriate development in the Green Belt.

Consequently Policy SP11 should be changed, especially part '1' which wrongly assumes that identified development need alone justifies removal of land in the Council's proposed 'Growth Areas' from the Green Belt. Parts '2' and '3' of the policy are also deficient in allowing inappropriate development in both specified and unspecified locations in the Green Belt, contrary to national policy.

Included files

Title Managing Development in the Countryside

ID EGS9680

Person ID 1267468

Full Name Chris Berry

Organisation Details CPRE Hertfordshire

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Managing Development in the Countryside comment Policy DM39 on 'infilling' in villages should include criteria to ensure this is only allowed where this is sustainable, particularly in terms of transport and services, and although Policy SP12 '1' (d) would allow leisure uses in rural areas, the built development and ancillary uses associated with these should be limited to those that are essential and will not harm to the Green Belt and designated landscapes.

Included files

Title Managing Development in the Countryside

ID EGS10329

Person ID 1144307

Full Name Mr Chris Lumb

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>1 Green Belt: I believe that the plan completely ignores statements made by HM Government to the effect that Green Belt should be protected at all costs, including a 2020 statement by the Prime Minister at the Conservative Party Conference, when he said “We will make it faster and easier to build beautiful new homes without destroying the green belt or desecrating the countryside”. Some 60% of Dacorum is Green Belt land, and this should be regarded as sacrosanct, and not as a resource for building on. I simply cannot accept the suggestion that there is exceptional need, since Dacorum needs to set out detailed information to prove beyond all reasonable doubt that this might be the case. In any case, if the newer ONS algorithm were applied in Dacorum, the projected housing need would reduce by an amount that exceeded the number of housing units that the plan suggests would have to be built on Green Belt land. Thus, using the latest data would remove the need to have ANY green belt land re-classified at all. Moreover, in June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming “demand for housing alone will not change Green Belt boundaries”. I don’t see how Dacorum can feel it is following this commitment. Again, 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 states “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places”.. The same guidance also says, in further clarification: “Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.”. Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I do not understand why DBC Planning felt unable or unwilling to make a case that can be “robustly justified”. In fact, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the new Draft Plan does not seem to reflect any of this.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS10680
Person ID	1161079

Full Name	Melanie Llewellyn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I fail to understand why DBC Planning felt unable or unwilling to make a case for preserving the Green Belt that can be “robustly justified”.
Included files	
Title	Managing Development in the Countryside
ID	EGS10922
Person ID	1153827
Full Name	Duncan Eggar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<ol style="list-style-type: none"> 1 In para 19.17 you state: The Plan allows for the principle of more development opportunities Aldbury, Long Marston and Wilstone than the equivalent selected villages in the Green Belt. Furthermore, the above approach to the definition of a village would also exclude many other smaller villages and hamlets in the Rural Area. 2 In para 19.27 you state: in all cases, development in the Rural Area should not result in harm to the character and appearance of the countryside or the existing character of a village. <ol style="list-style-type: none"> 1 Aldbury, which is as you will observe where I live. In recent years I have been told informally by planning officers that Aldbury is a ‘jewel in the crown’ of Dacorum and it would be most unlikely that anything beyond very small infill development within the existing limits of the settlement would be permitted.

These two statements imply the potential to have a change of approach to development in the village. My experience is that lack of precision in statements like these provides 'wriggle room' that will allow development beyond what might reasonably be expected. Please will you provide greater clarity of your intentions so that we can provide informed comment.

Included files

Title Managing Development in the Countryside

ID EGS11179

Person ID 1264551

Full Name Mark Somervail

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment The Guiding Development policies do not give sufficient importance to preserving the Green Belt. The incorrectly determined need for new housing has been given more weight than the need to preserve the Green Belt which is irreplaceable.

The NPPF 2019 paras 143 and 144 declare that the use of green belt is only appropriate in exceptional circumstances when its use is clearly outweighed by other considerations. This case has not been proven.

The NPPF states that the Green Belt was created to prevent urban sprawl. The policies would create urban sprawl by merging Berkhamsted with Northchurch.

The policies do not place enough emphasis on the use of brownfield sites such as BK13 Gossoms End which could incorporate higher density housing instead of the supermarket which is no longer to be built. This site is within walking distance of Berkhamsted town centre and railway station.

Included files

Title Managing Development in the Countryside

ID EGS11347

Person ID	1269008
Full Name	Mr Steven Kerry
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	<u>SP12 -Development in the Rural Area</u> We object to Policy SP12 on the basis that it severely limits the amount of development to be direct towards the settlements located in the Rural Area. As stated elsewhere in these representations, these settlements are some of the least constrained in the Borough, being located wholly outside the London Metropolitan Green Belt and Chilterns AONB. It remains the case that these settlements are considered suitable for a greater proportion of housing than is currently permitted in the emerging Plan. Such sites in these areas would be delivered quickly and be of a smaller scale than at the larger settlements in the Green Belt and AONB and therefore with less environmental impact.
Included files	
Title	Managing Development in the Countryside
ID	EGS11459
Person ID	1261429
Full Name	Douglas Fisher
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	Policy SP4 Item 1 States that new homes will be delivered through: g) the development of small-scale sites within the selected small villages

Paragraph 19.13 gives support to limited development in these small villages in order to, amongst other reasons, "ensure that the more rural parts make a small contribution to the development requirements of the Borough". Any such new houses would form part of the windfall allowance that needs to be justified in order to achieve the housing numbers proposed.

Policy DM39 however is so restrictive that it effectively prevents any additional homes being provided within the Wigginton village envelope. It can be seen from an inspection of the road frontages that there are no longer any gaps (Item 2 b) except for that comprising the recreational ground which would be ruled out under Item 2 e) This why the few new houses built recently have only been possible by the demolition of existing ones.

NPPF Para 145 e) simply allows the construction of "new buildings" as not inappropriate within the Green Belt under various specified exceptions, including "limited infilling in villages". The proposed new policy DM39 is unnecessarily much more restrictive making it inconsistent with the NPPF

Item 2 a) attempts to address the case law issue regarding village envelope boundaries but not in a satisfactory way leaving the problem of uncertainty unresolved. A Local Plan is required to have a definitive map for each policy which is negated by 2a). In any event the existing envelope is out of date and needs extending due to recent developments such as the village shop. There are also anomalies such as the recreational ground being perversely included and parts of the boundary undefined by physical features making them indefensible. An obvious and appropriate solution to this problem is for these villages to be 'inset' within the Green Belt instead of being 'washed over' by it. This would also highlight the importance of the Green Belt between Tring and Wigginton.

Items 2 c) and d) require any new buildings to be dwellings which is contrary to Para 145 e) which has no such requirement. There has been a loss of local services over the years in Wigginton with a public house (The Brewhouse), a village shop, a farm shop and a Post Office all being converted into housing and this policy ought to be reversing this trend not enforcing it. CS6 at least also allowed "local facilities to meet the needs of the village"

Items 2 b), c) and d) have restrictions which were found to be "unduly onerous" by the Inspector conducting the 2002 Inquiry who decided that the limitation to gaps in frontages was "unduly restrictive" and that "new infill development could in some cases be accommodated on backland sites without detriment"

Item 2 f) is therefore the only valid restriction for these villages.

Title	Managing Development in the Countryside
ID	EGS11596
Person ID	1269148
Full Name	SIMON AND ANNA BARNARD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	<p>Policy SP11 - Development in the Green Belt – The Plan needs to be much more explicit as to how the Council has demonstrated ‘exceptional circumstances’ for removing land from the Green Belt to allow for development.</p> <p>One of the main purposes of the Green Belt is to prevent urban areas expanding into the open countryside. This Plan has all the main urban areas expanding into open countryside. The need for additional housing does not on its own create an exceptional circumstance for allowing development in the Green Belt. The fact that the areas adjacent to settlements provide green space and a quality environment for local residents should weigh heavily against changing the Green Belt boundaries. The Council should read '<i>Repurposing the Green Belt for the 21st Century</i>' by Peter Bishop et al. This acknowledges the social, environmental and economic importance of the Green Belt. National housing targets are very unclear at the moment, and boroughs such as Dacorum should be expected to provide less housing than more built up and less protected areas elsewhere in the region and nationally. These figures and the proposed sites must be reviewed when the methodology for assessing housing numbers has been revised.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS11728
Person ID	1152494
Full Name	MRS G RUSSELL
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Re: 19: Managing Development in the Countryside: 19.6: There is no justification of “exceptional circumstances” to allow the massive development proposed in the Green Belt, amending the boundaries on such a scale to take such a big area out of the Green Belt. This is against the NPPF policy para 11b, footnote 6.
Included files	
Title	Managing Development in the Countryside
ID	EGS12132
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	
Managing Development in the Countryside comment	1 Managing Development in the Countryside Policies SP11 to SP12 & DM39 to DM40 No objections
Included files	
Title	Managing Development in the Countryside
ID	EGS12334
Person ID	1269489
Full Name	STEVE HILL

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside 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	Managing Development in the Countryside
ID	EGS12490
Person ID	1269524
Full Name	DAVID ATKINSON
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	The plan should also guarantee the following: Green belt land to only be released in phases, with a date contractually agreed with developers to begin work to both allow a change in strategy if house demand decreases and also to ensure developers do not bank land to inflate prices.
Included files	
Title	Managing Development in the Countryside
ID	EGS12879
Person ID	1269665

Full Name	Mr Martin Hicks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>19 Managing Development in the Countryside</p> <p>Policy SP12 - Development in the Rural Area is broadly supported. However, within the rural area uses such as paintball games, horsiculture, wedding venues, golf facilities are amongst activities covered by recreation and social, community and leisure. All can have damaging impacts on the local environment and ecology depending on their nature and intensity- from direct damage to noise or light pollution and general disturbance. Consequently this should be amended to include:</p> <p>1 The following development will be permitted provided that they are compatible with the character, appearance 'and nature' of the Rural Area:</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS12891
Person ID	1207443
Full Name	Mrs Jennifer Bissmire
Organisation Details	Clerk Markyate Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	Managing Development in the Countryside

As we have said repeatedly, 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, The latest information suggests that there is no need to build on Green Belt sites to meet the justifiable housing needs.

It is a pity that the planners have not distinguished between the postal addresses for Markyate and Flamstead and the civil parish boundary between the two villages. The boundaries are very different and policies adopted for the two villages have also been very different. We leave it to other communities to comment on policies that affect them.

Included files

Title Managing Development in the Countryside

ID EGS13441

Person ID 1270263

Full Name MRS SHARON O'SULLIVAN

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment Section 19 Managing Development in the Countryside
Policy DM39 deals with development in Wigginton and 3 other small villages in the Green Belt. In one way it is less restrictive than the current Policy CS6 in that limited infilling, which currently is understood to mean not more than 2 additional dwellings, will in future have no such specific limitation. It will however be subject to a number of criteria such as being in a gap in an existing frontage, on the same building line and not include backland development. Infilling will also be limited to housing whereas currently it includes local facilities to meet the needs of the village (such as a village shop)

No such restrictions apply to Aldbury despite it also being in the Chilterns AONB.

The reasons given for this are to allow greater flexibility towards the levels of new housing development in Aldbury and the potential difficulty of controlling development in the Green Belt. However, as they are both in the Chilterns Area of Outstanding Natural Beauty there is an obvious argument for treating these villages the same. Furthermore, the evidence (Urban Capacity Study, Appendix C) that the consultation is based on suggests no such difficulty has been encountered in controlling development in either of these two villages. (Only 3 new dwellings in total were approved within the village envelopes of these two villages during the 2006 to 2020 study period}T

The Wigginton village envelope is not at all clear on the Proposals Map due to the scale used but it appears to be the 2002 version currently in use. Local Plan village envelope boundaries are however no longer considered definitive as case law has established that they need to be assessed 'on the ground'. The Dacorum position (Background Topic Paper Green Belt and Rural Area) is that the current village envelope should be used as a starting point for any such assessment. However, the current version is out of date as it is now nearly 20 years old and contains some anomalies such as the inclusion of the recreational ground. Dacorum therefore now ought to undertake an 'on the ground' assessment to take into account developments such as the village shop and publish a revised version to be incorporated into the new Local Plan. One obvious solution to the uncertainty caused by the case law would be to make the 4 selected small villages 'inset' rather than being 'washed over' by the Green Belt. This would also make the envelope boundaries much more sustainable as any future 'on the ground' assessment challenges under case law would no longer be relevant as that case law does not apply to Green Belt boundaries

Included files

Title Managing Development in the Countryside

ID EGS13470

Person ID 1270266

Full Name VANDA EMERY

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Managing Development in the Countryside comment 6) 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 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 Managing Development in the Countryside

ID EGS13682

Person ID	1207133
Full Name	Chilterns Conservation Board
Organisation Details	Chilterns Conservation Board
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>SP11 Green Belt Object.</p> <p>The CCB has several concerns about the Green Belt policy. Note that our interest in this policy stems from our position that much of the Green Belt in Dacorum Borough serves an important function in terms of helping to manage development in the setting of the AONB (as well as the AONB itself), and the long-term (supposedly permanent) nature of Green Belt provides a context which facilitates investment in environmental and landscape improvements on the land it protects.</p> <p>There is a typographical error in the second sentence of clause 1: we presume it should read “reviewed to exclude land in defined Growth Areas”.</p> <p>The wording of clause 1 is slightly misleading, because, while the council has undertaken a review of the Green Belt, the boundaries of the Green Belt will not be amended until the plan is adopted. At the current time the growth areas are only proposed to be removed from the Green Belt. This should have been clear in the plan until the publication draft, and the proposals map should have represented the land proposed to be removed from the Green Belt.</p> <p>As noted in relation to the specific sites, CCB considers that the extent of landscape buffers in development sites necessary to maintain the protection and enhancement of the Chilterns AONB and other assets of importance such as the Chilterns Beechwoods SAC should have been identified by this stage of the plan process, and retained as designated Green Belt.</p> <p>We consider that clause 2 of the policy could be clarified by referring to the relevant sites as being “developed sites washed over by Green Belt” or similar.</p> <p>We consider that clause 3 of the policy could be clarified by noting that “proposals will only be acceptable” etc.</p> <p>DM39 Limited infilling in small villages Object.</p> <p>The CCB considers that the policy does not draw out a distinction between villages in the Green Belt only, and those in also in or adjacent to the AONB. Wiggington is in the AONB, and Flamstead and Potten End are very much in its setting. It might be appropriate to include the Chilterns Buildings Design Guide in the supporting guidance.</p> <p>SP12 Rural Area</p>

Object.

The CCB objects to this policy, which significantly, and unnecessarily, adds to the complexity of the plan. The terms “Rural Area” is used in several places in the plan (albeit, sometimes, with different capitalisation) to refer to (a) the intended policy area, which applies to all of the borough outside the Green Belt but not part of a larger settlement, (b) the definition provided in the Housing Act which applies to how affordable housing (and some other) policies are applied, and (c) the colloquial meaning of countryside or land remote from towns.

The policy itself applies a range of blanket restrictions and other matters to the consideration of development proposals. These are articulated in a way that suggests they will be applied with a similar rigour to Green Belt and AONB policy. This is not supported by national planning policy. Because the designated area overlaps with the Chilterns AONB, this muddies the waters of applying policies appropriate to the national designation. Indeed, several policies in the draft plan refer to approaches to be taken in the Rural Area without reference to the – more legitimate – approaches demanded by AONB policy.

No reasoning is given for why clause 4 of the plan should apply equally to Long Marston and Wilstone (not in the AONB) and Aldbury (in the AONB) while other similar villages in the AONB are not mentioned.

We consider that the Rural Area policy should be excised from the plan entirely. If it is to be retained, then it should explicitly only apply to the (small) area of the borough that is neither town, nor Green Belt, nor AONB.

Included files

Title

Managing Development in the Countryside

ID

EGS13846

Person ID

1270387

Full Name

Mr Richard Pilkinton

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Managing Development in the Countryside comment

As I have already said, I oppose building in the Green Belt and do not believe that the new building is needed to enable people in housing need to remain in their local village. As existing properties become available the Borough Council should show preference when allocating their vacated properties to people who have a local connection with the village or parish, through work, residence or family.

Again, I am using Markyate to illustrate the problems with the guiding development policies which do not address the sustainability of rural communities away from the A41 corridor.

The local roads in Markyate are very badly congested, exacerbated by the recent new developments. Young people are increasingly unable to move from the parental home due to the cost of housing locally. Many of these young adults will have cars to enable them to access work. Parents are seeking to extend their properties to accommodate their adult children; the profusion of extensions is becoming overpowering; certainly there should be restrictions to ensure that adequate parking is provided.

There has been a long-standing requirement for a residential care home in Markyate, the guiding development policies need to look at individual communities, not the Borough as a whole. Any residents in the Borough who come to need special accommodation or care in a Care Home want to remain in the community they live in.

Included files

Title Managing Development in the Countryside

ID EGS13861

Person ID 611689

Full Name Mrs Sheila Pilkinton

Organisation Details Markyate Parish Council

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Managing Development in the Countryside comment As I have already said, I oppose building in the Green Belt and do not believe that the new building is needed to enable people in housing need to remain in their local village. As existing properties become available the Borough Council should show preference when allocating their vacated properties to people who have a local connection with the village or parish, through work, residence or family.

Again, I am using Markyate to illustrate the problems with the guiding development policies which do not address the sustainability of rural communities away from the A41 corridor.

The local roads in Markyate are very badly congested, exacerbated by the recent new developments. Young people are increasingly unable to move from the parental home due to the cost of housing locally. Many of these young adults will have cars to enable them to access work. Parents are seeking to extend their properties to accommodate their adult

children; the profusion of extensions is becoming overpowering; certainly there should be restrictions to ensure that adequate parking is provided.

There has been a long-standing requirement for a residential care home in Markyate, the guiding development policies need to look at individual communities, not the Borough as a whole. Any residents in the Borough who come to need special accommodation or care in a Care Home want to remain in the community they live in.

Included files

Title Managing Development in the Countryside

ID EGS14099

Person ID 1270485

Full Name Mr Colin Poole

Organisation Details

Agent ID 1261397

Agent Name Chloe
French

Agent Organisation Planning Associate
Bidwells LLP

Yes / No
* Yes
* No

Managing Development in the Countryside comment **Additional Comments**

We welcome policy SP12 'Development in the Rural Area', particularly point 2.f of the policy which allows for alternative uses for previously developed sites. Given the changing nature of the rural environment, development in suitable locations should be encouraged to ensure that it is able to adapt to the changing demands.

Included files

Title Managing Development in the Countryside

ID EGS14106

Person ID 1270501

Full Name DAVID WHITE

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>The Guiding Development policies do not give sufficient weight to preserving the Green Belt. The NPPF makes it clear that development in the Green Belt is “inappropriate”. The National Planning Policy Framework 2019 (NPPF) paragraph 143 notes that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances:</p> <p>‘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.’ (para 144)</p> <p>The main considerations are the effect that developments have on the openness and purposes of the Green Belt, the character and appearance of the area, and whether any harm is outweighed by other considerations which would justify the development.</p> <p>Taking any benefit of the proposed developments into account, the harm to the Green Belt on the Growth Areas in Northchurch has not been “clearly outweighed”, and very special circumstances do not exist to justify allowing the “inappropriate development”.</p> <p>In addition, NPPF, paragraphs 133-147, emphasise the fundamental aim of the Green Belt to prevent urban sprawl by keeping land permanently open. Dacorum’s Guiding Development policies do not give sufficient weight to preventing urban sprawl. As a result, the proposed developments in Northchurch ‘sprawl’ into Berkhamsted.</p> <p>The Guiding principles do not justify building in the Green Belt and fail to prevent urban sprawl.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS14368
Person ID	1270640
Full Name	Geoffrey Llewellyn
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, I fail to understand why DBC Planning felt unable or unwilling to make a case for preserving the Green Belt that can be “robustly justified”.
Included files	
Title	Managing Development in the Countryside
ID	EGS14403
Person ID	1270653
Full Name	NEIL BRANCH
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	the plan does not protect the green belt that the NPPF demands, and prioritises green belt development over urban development
Included files	
Title	Managing Development in the Countryside
ID	EGS14444
Person ID	1270666
Full Name	STEVEN KOSKY
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>Vistry does not consider Green Belt Policy SP11 to be sound, as currently worded, although the broad intentions of Dacorum's Green Belt Policy and the emerging Dacorum Local Plan, taken as a whole, are generally supported.</p> <p>Policy SP11 should have more flexibility to facilitate the release of minor areas of Dacorum Green Belt in boundary fringe locations, where this would help to bring forward sustainable development in adjacent settlements in neighbouring authorities, such as at Redbourn in St Albans District.</p> <p>We therefore recommend that an additional criterion (e) be added to Policy SP11 as follows: 'e. required minor consequential changes in boundary locations arising from the sustainable expansion of other settlements adjoining Dacorum Borough in neighbouring authority areas, where exceptional circumstances can be demonstrated and where the loss of Green Belt in Dacorum would not prejudice the wider objectives of Policy SP2 or Policy SP 11. Applicable sites should be no greater than 1 hectare in area and must be fully incorporated within the wider scheme'.</p> <p>Full details for the rationale for this proposed change are set out in the accompanying Regulation 18 written submissions by Turley and the Vision Document prepared by CSA.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS14491
Person ID	1270679
Full Name	GLENEDEN PLANT SALES LTD
Organisation Details	
Agent ID	1270678
Agent Name	MR WILLIAM LLOYD
Agent Organisation	DLP PLANNING LTD

Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	Draft Policy SP11, seeks to determine the suitability of development in the Green Belt. However, the draft Policy does not consider the merits of previously developed land in the Green Belt as is required by the NPPF. This is set out in paragraph 137a which states: “...whether the strategy makes as much use as possible of suitable brownfield sites and underutilised land...” In accordance with the above section of the NPPF, it is clear that sites which are considered to be brownfield land, should be given preferential treatment over their greenfield counterparts located in the Green Belt. In doing so, this should enable the preservation of the Green Belt to a greater degree and focus development efforts to sites that will have lesser adverse impacts upon the Green Belt. As such, the Policy should be edited to include reference to brownfield sites and to note that they should be preferred for development compared to those sites located in the Green Belt.
Included files	
Title	Managing Development in the Countryside
ID	EGS14760
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	5.2 Policy SP11 Development in the Green Belt refers to the Policies Map to define the extent of the Green Belt. It states that the “Green Belt boundary has been reviewed to land in defined Growth Areas to meet identified need over the lifetime of the Plan”. As per the Draft Proposals Map, land within Growth Areas is proposed to be removed from the Green Belt.
Included files	
Title	Managing Development in the Countryside

ID	EGS14842
Person ID	325470
Full Name	Gardener Family Trust
Organisation Details	Gardener Family Trust
Agent ID	1270807
Agent Name	Mr Alistair Brodie
Agent Organisation	Henry H Bletsoe & Son LLP
Yes / No * Yes * No	
Managing Development in the Countryside comment	Managing Development in the Countryside - Our clients acknowledge the importance of the Green Belt and the objectives set out in the NPPF. It is acknowledged that Green Belt boundaries can only be amended in exceptional circumstances but, where an authority has to plan for additional housing, as is the case in Dacorum, it is inevitable that some Green Belt land will have to be released for development. We would argue that our clients' site could be released from the Green Belt, to allow development which would assist in meeting the housing targets within the Borough.
Included files	
Title	Managing Development in the Countryside
ID	EGS14854
Person ID	1270808
Full Name	Westmorland Limited
Organisation Details	Westmorland Ltd
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	

Managing Development in the Countryside comment

Policy DM30 Biodiversity Net Gain

Policy DM30 Biodiversity Net Gain follows national guidance and requires a 10% net gain to be achieved, determined by applying the Natural England Biodiversity Metric 2.0 Calculator. Reference to any relevant successor calculator may be sensible.

Policy DM36 Tree Retention and Protection

Policy DM36 states *“All development will be expected to incorporate two or more new trees per dwelling or per 100sqm floor space on-site. Where a tree is lost through development at least three new ‘like for like’ trees must be provided”*. Whilst the aspirations of the policy are welcomed, this specific requirement is considered to be overly prescriptive and does not allow for a positive landscape scheme which reflects the site For example, other landscape treatment, such as hedgerow for example, may be more appropriate to the character of the area and may have more opportunities for biodiversity.

Policy SP11 Development in the Green Belt

Policy SP11 Development in the Green Belt refers to the Policies Map to define the extent of the Green Belt. It sets out that the Council will support the principle of development in the Green Belt in the following specified locations in order to help meet Borough-wide strategic commercial, transport and social and community objectives and subject to other policies and/or site-specific requirements being This list includes the redevelopment/enhancement of the Watling Street Truck Stop, London Road, Flamstead (Growth Area Cy05), although the policy reference should be Cy03 not 05.

This identification of this site as suitable for development in the Green Belt is supported, however, it should be clarified that the redevelopment/ enhancement will include an expansion of the existing facility in line with site boundary identified on the draft proposals As the principle of development has been supported by the Council, as it is simply an expansion of and existing use, the preference is for the site to be removed from the Green Belt. Given the Regulation 18 Stage of the Plan, there is a further opportunity to consider this. Further discussion in respect of this is welcomed.

If the Green Belt boundary is not amended and the site remains washed by Green Belt, the policy enabling development should assist to further facilitate the delivery by clearly acknowledging that the proposed development is capable of being 'not inappropriate' in the Green Belt in accordance with paragraph 146 of the NPPF. Specifically, the policy could helpfully outline that very special circumstances are not required to be set out as the proposal qualifies as local transport infrastructure which can demonstrate a requirement for a Green Belt location.

The Green Belt Topic Paper, as well as evidence summarised above, confirms that the expansion of the truckstop has been demonstrated to be essential Dacorum Borough holds a strategic position, incorporating the M1 Motorway, and it has been identified that there is a critical level of need for the expansion of services in this location. Recognition of this in the policy is welcomed. The policy should also clarify what the proposed redevelopment/ enhancement will comprise of a comprehensive upgrade of the site, including a new, expanded and relocated facilities building and additional parking provision. This will provide clarity for any future planning applications.

Included files

Title

Managing Development in the Countryside

ID	EGS14906
Person ID	1270828
Full Name	Owen Ellander
Organisation Details	Head of Property Development Greene King Brewing and Retailing Ltd
Agent ID	1270829
Agent Name	Mrs Helen Binns
Agent Organisation	Walsingham Planning
Yes / No * Yes * No	
Managing Development in the Countryside comment	<p>We are instructed by Greene King Brewing and Retailing Limited to make representations on their behalf to the Dacorum Local Plan (2020-2038): Emerging Strategy for Growth. Specifically, we write with reference to land to the north of the Red Lion Public House on London Road, Hemel Hempstead. These representations request (1) the land is removed from the Green Belt and (2) the land is allocated a Growth Area for housing in the emerging Local Plan. A plan identifying the land in question is contained with this letter.</p> <p>At the outset, the Council's attention is drawn to the lack of clarity concerning the subject site and its designation on the draft Proposals Map. In particular, it is not clear whether the site is within or outside of the settlement boundary. The draft Proposals Map appears to show the site both within the settlement boundary of Hemel Hempstead and within the Green Belt with the two designations conflicting with one another.</p> <p>It is our view that the site should unquestionably lie within the defined settlement boundary of Hemel Hempstead. However, in the absence of clarity, this letter explains why we consider the site should <u>not</u> be within the Green Belt and why it should be allocated for housing.</p> <p><u>Site</u></p> <p>The site comprises an irregular shaped parcel of land that extends to an area of circa 1 hectare. It is located to the east of A4251 London Road, to the north of Nash Mills Lane and the Red Lion Public House, to the west of the River Bulbourne / Grand Union Canal and a recent residential development and to the south of an employment area. The site is generally flat and is considered suitable for development.</p> <p>Although the site appears within the Green Belt, it does not serve any of the five purposes for including land within the Green Belt. It is also entirely disconnected from the open countryside. Indeed, the site is most accurately described as an edge of urban area undeveloped greenfield infill site. There is in our view therefore no planning basis for the site being within the Green Belt and not being available for development, particularly given the current pressure and demand</p>

for land to meet future development needs within the main urban areas and particularly Hemel Hempstead. The site directly abuts employment development to the north and residential development to the east and a public house to the south. The wider area around the site is mixed in nature comprising a mix of residential, employment and commercial and retail uses. The site is in a highly sustainable location and accessible by a range of non-car modes of transport. It is also accessible to a range of local services and facilities and employment opportunities.

The site is entirely in the ownership of Greene King Brewing and Retailing Ltd and is not subject to any existing leases. It is not in an existing active use and thus is available for immediate development subject to the necessary the planning permission being achieved. Having regard to the location of the site on the edge of main urban area of Hemel Hempstead, it is considered a suitable and appropriate site for accommodating future development needs. Whilst the site is subject to a number of constraints, they are not considered insurmountable or barriers to the development of the site. The land thus represents a viable and entirely deliverable development opportunity.

Regarding the Green Belt designation, it is entirely unclear from the draft Proposals Map whether the land is actual meant to be shown as within the Green Belt or whether it is a drafting error. Notwithstanding this fact, in the event that it is within the Green Belt. it is our view that it should be removed from the Green Belt as part of the preparation of the new Local Plan, with the land incorporated into the defined settlement of Hemel Hempstead. This is because the designation of the land as Green Belt, cannot in our view be justified, by reference to the five reasons for including land in the Green Belt. The reasons for this are set out in detail below.

It is also worth noting at this point, that the site was submitted and promoted as a future development site in the Council's 2017 'Call for Sites' consultation. The Council's assessment of the site is contained within the Site Assessment Study January 2020 under Ref. 66 Land adj. Red Lion, Hemel Hempstead. The Council's overall conclusion was as follows:

"Site considered suitable for residential or employment use. Whilst its existing contribution to Green Belt purpose is strong, it performs sufficiently well on other criteria to enable it to be considered potentially suitable for allocation with major constraints".

Having considered the site in some detail, aside from its Green Belt designation, we do not consider the land to be subject to insurmountable constraints and indeed, this is confirmed by the Council's site assessment. With regard to the Green Belt, whilst the wider parcel of Green Belt land which the site forms part of for assessment purposes (Ref. HH-A12 in the Stage 2 Green Belt Review and Landscape Appraisal (January 2016)) is considered to perform strongly in terms of the purposes of including land in the Green Belt, the contribution that this individual parcel of land makes has not been assessed and when it is, it is clear that it contributes little if anything to the five purposes for including land in the Green Belt. By virtue of this fact, the land should in our professional view be removed from the Green Belt.

Green Belt – Policy SP11'Development in the Green Belt'

Draft Policy SP11 defines the extent of the Green Belt by reference to the Proposals Map and provides a policy framework for the assessment of applications for planning permission for the development of land in the Green Belt.

Greene King Brewing and Retailing Ltd object very strongly to the land the subject of these representations being included within the Green Belt and as a result, to Policy SP11. For reasons set out elsewhere in this letter, we consider that the

land should be removed from the Green Belt. We further consider that this change to the emerging Local Plan is necessary to ensure that the Plan is sound, justified, effective and consistent with national planning policy.

NPPF

The NPPF states at paragraph 134 that the Green Belt serves five purposes:

- 1 To check the unrestricted sprawl of large built up areas;
- 2 To prevent neighbouring towns from merging into one another;
- 3 To assist in safeguarding the countryside from encroachment;
- 4 To preserve the setting special character of historic towns; and
- 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It goes on to state at paragraph 136 that “*once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*”. It further states that “*when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account*” and “*where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport*”.

When defining Green Belt boundaries, plans are required amongst other things to:

- Ensure consistency with the development plan strategy for meeting identified requirements for sustainable development;
- Not include land which is unnecessary to keep permanently open,
- Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period.
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

The NPPF requires that exceptional circumstances be demonstrated to justify removing land from the Green Belt and amending the Green Belt boundary.

Justification for removing the land from the Green Belt

Our client’s case for the removal of the land from the Green Belt and exceptional circumstances, is set out below:

Green Belt purposes

The land the subject of these representations has been assessed as part of the Council’s Green Belt Review as part of a larger land parcel reference HH-A12. The assessment concludes that this wider parcel of Green Belt should be retained and that it meets three of the five purposes for including land within the Green Belt.

Given the subject site was promoted in the 2017 ‘Call for Sites’ consultation as a sustainable development site on the edge of the built-up area of Hemel Hempstead, it is our view that a detailed and more focused Green Belt assessment should have been undertaken of the site. The purpose being to determine whether the land parcel serves any of the five purposes of including land within the Green Belt and therefore whether it should be retained within the Green Belt or

removed from it as part of a review of development plan and Green Belt boundaries. Such an assessment does not appear to have taken place but is set out below.

- *Purpose 1 – Checking the unrestricted sprawl of the built up area*

The site serves no purpose in preventing the unrestricted sprawl of the urban area of Hemel Hempstead which in this location is very clearly kept in check by existing strong and permanent boundaries formed by the A4251 London Road and the railway line to the east, Nash Mills Lane to the south and Lower Road beyond the recent residential development to the east. There is also existing built development in the form of the Red Lion Public House between the site and Nash Mills Lane and the site directly abuts the built-up area of Hemel Hempstead and an employment allocation to the north.

The site has a strong level of containment and an existing relationship with the built-up area of Hemel Hempstead. Consequently, it has no role in restricting the sprawl of Hemel Hempstead south which is naturally contained by the existing highways.

- *Purpose 2 - Preventing neighbouring towns from merging*

The nearest neighbouring settlements to the south are the small villages of Nash Mills and the large village of Kings Langley. Given the presence of built development to the south and east of the site and the presence of Nash Mills Lane/ Red Lion Lane, which serves as a robust and physical boundary between Hemel Hempstead and these settlements, it is clear that the site serves no purpose in preventing these neighbouring settlements from merging with the main urban area. Furthermore, the site feels very much part of the main urban area of Hemel Hempstead.

As is set out in the Council's Green Belt assessment of parcel HH-A12, the main purpose of the Green Belt in this location is to prevent Hemel Hempstead coalescing with the village of Nash Mills via ribbon development along Lower Road. The subject site serves no purposes in preventing this.

The nearest settlement to the west is the small village of Ruckers Lane. The site serves no purpose in preventing the main urban area of Hemel Hempstead merging with this village as the two settlements are clearly separate by the robust and permanent barrier of the A4251 London Road and mainline railway which runs above.

- *Purpose 3 -Safeguarding the countryside from encroachment*

The site is in no way connected or linked to the open countryside and is completely isolated and disconnected from it. The site is separated from the open countryside to the west by the A4251 London Road and the railway line and its embankment, which forms a very substantial and permanent barrier and to the south by the Red Lion Public House, including its large curtilage, Nash Mills Lane and built development beyond it. The open countryside is a circa 250 metres to the east and the site is separated from it by the River Bulbourne/ Grand Union Canal and a large modern residential development. To the north there is no open countryside and only the main urban area of Hemel Hempstead. Accordingly, the site cannot be considered to serve any purpose of safeguarding the open countryside from encroachment.

- *Purpose 4 – preventing the setting and special character of historic towns*

Hemel Hempstead is not a historic town and as such, the site serves no purpose in this regard.

- *Purpose 5 – Assisting in urban regeneration*

Hemel Hempstead is a large town and the top of the settlement hierarchy within which there are a variety of regeneration opportunities. The extent and position of the Green Belt around Hemel Hempstead thus serves no purpose in the terms of assisting urban regeneration. It is also not relevant to these representations as the site is greenfield rather than brownfield.

Having regard to the assessment set out above, it is our view that the subject site comprising land adjacent to the Red Lion Public House makes no contribution to the five purposes of including land in the Green Belt. Accordingly, supported by clear and robust evidence of exceptional circumstances, it should be removed from the Green Belt as part of a review of the development plan.

Exceptional Circumstances

As has been set out above, government guidance contained in the NPPF requires exceptional circumstances to be demonstrated before land can be removed from the Green Belt and that these are fully evidenced and justified. In this case, there are two exceptional circumstances that apply, and which justify the removal of the land from the Green Belt.

1 Land does not meet a purpose for including land in the Green Belt

The information set out above clearly shows that land to the north of the Red Lion Public House does not meet any of the five purposes of including land within the Green Belt. Furthermore, paragraph 133 of the NPPF makes it clear that openness is one of the essential characteristics of the Green Belt. The site the subject of these representations does not contribute to the openness of the Green Belt. It is surrounded on all sides by physical development and does not form part of a wider parcel of open land.

The mere fact that the land does not display any of the essential characteristics of Green Belt land or contribute to any of the five purposes of including land within the Green Belt is in our view an exceptional circumstance that justifies the land being removed from the Green Belt. For this this reason alone, the land should, in our view, be deleted from the Green Belt in the new Local Plan and incorporated into the settlement boundary of Hemel Hempstead.

1 Need for land to meet the requirement for additional housing

We do not propose to rehearse the Council's housing requirement or the planning justification for the need for additional land within the Borough's defined settlements, particularly Hemel Hempstead. However, in simple terms the Council requires as much land as possible in sustainable locations within the urban area in order to meet future development needs, particularly the need for housing, thereby protecting the most precious and sensitive areas of the open countryside and Green Belt.

Whilst greenfield, land to the north of Red Lion Public House, provides an opportunity to deliver a significant number of new homes in a sustainable and well-connected location on the edge of Hemel Hempstead which is the Borough's main / strategic settlement and the focus for housing growth. Considering the scale of housing need, the limited availability of suitable land within the main settlements and the fact that the land the subject of these representations does not contribute to the purposes of including land within the Green Belt, it is our view that clear and demonstrable exceptional circumstances exist to justify this land being removed from the Green Belt.

Consistent with Development Plan Strategy and sustainable

For the site to be released from the Green Belt, it also needs to be shown that the allocation or development of the site is consistent with the Local Plan Spatial Strategy and would constitute sustainable development.

As has been set out elsewhere in these representations, the site abuts the settlement boundary of Hemel Hempstead. Hemel Hempstead sits at the top of the settlement hierarchy and is the Boroughs main strategic settlement. It is the most sustainable location in the Borough and is identified as the focus for most development over the Plan period. The development of the site for housing would therefore be entirely consistent with and support the spatial strategy for Dacorum with regards the location of new development. Indeed, were it not for the fact that the site lies within the Green Belt it would almost certainly have come forward for housing development a number of years ago.

The development of the site for housing would also represent a sustainable development. The site is located on the edge of the 'Two Waters Opportunity Area' and indeed, there would be logic in bringing the site within this area. It is readily accessible by alternative modes of transport being within close proximity of bus stops on London Road and Nash Mills Lane and accessible to Apsley railway station which is located circa 750 metres to the north. The site is also within close proximity of Apsley District Centre as well as a local centre and other social and community infrastructure, including local schools.

In conclusion, we have robustly shown why land to north of the Red Lion Public House should not be retained in the Green Belt but removed from it and brought within the defined settlement boundary and built-up area of Hemel Hempstead. Not to do so would in our view render the plan unsound and not positively prepared, and not justified, ineffective and inconsistent with government guidance contained in the NPPF.

Conclusion

To conclude, our client considers that land to the north of the Red Lion, London Road, Hemel Hempstead should be removed from the Green Belt and the land brought within the defined settlement boundary of Hemel Hempstead. Our client also considers that the land should be brought within the "Two Waters Opportunity Area' and allocated as a Growth Area for housing in the new emerging Local Plan.

Included files	Site Location Plan.pdf
Title	Managing Development in the Countryside
ID	EGS14918
Person ID	1270836
Full Name	Tully Children's Fund
Organisation Details	Tully Children's Fund
Agent ID	1270837
Agent Name	Sav Patel
Agent Organisation	Associate Director

Strutt & Parker

Yes / No
* Yes
* No

Managing Development in the Countryside comment Draft policy DM39 (Limited Infilling in Selected Small Villages in the Green Belt) is too restrictive to allow any meaningful development and should be relaxed. Villages such as Flamstead could play an important role in delivering housing units to help meet the short term supply of growth. Smaller scale sites do not have the burden of having to deal with the up-front infrastructure costs for facilitating development sites.

In summary, a sound planning strategy for housing growth should be more balanced, with a reduced reliance on large strategic sites, and a more dispersed strategy for growth that makes provision for the impact and changes in work and living patterns from the COVID- 19 pandemic. Including housing development in a number of smaller and medium sized sites, which are capable of being delivered in the short term, will increase the feasibility of the Borough's housing growth plan.

Included files

Title Managing Development in the Countryside

ID EGS14920

Person ID 1270836

Full Name Tully Children's Fund

Organisation Details Tully Children's Fund

Agent ID 1270837

Agent Name Sav
Patel

Agent Organisation Associate Director
Strutt & Parker

Yes / No
* Yes
* No

Managing Development in the Countryside comment One of the main constraints to delivering growth in Dacorum is the Green Belt and In section 18.32 of the ESG, the Council's own assessment indicates that the likely significant effects from the urbanising impact of the planned growth cannot be ruled out. This includes the significant amount of visitor pressure on recreational areas such as Ashridge Commons and Woods SSSI, which are highly sensitive areas. This is acknowledged in point 1 of the section, which states that "...*Ashridge Estate and Tring Woodlands SSSI offer unique feature which cannot be easily replicated*

elsewhere". It is therefore that the ESG needs to strike the balance between meeting the housing demands for Dacorum whilst protecting the most sensitive parts of Dacorum. Therefore, it is not clear why the Council is proposing its largest allocation in close proximity to the AONB when there are clearly more appropriate alternative options such as dispersing the growth around the Borough. This would help to achieve the growth levels required whilst minimising the impact on the AONB and amount of land released from the Green Belt.

Included files	
Title	Managing Development in the Countryside
ID	EGS15132
Person ID	1270940
Full Name	
Organisation Details	CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	
Included files	
Title	Managing Development in the Countryside
ID	EGS15133
Person ID	1270940
Full Name	
Organisation Details	CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Managing Development in the Countryside comment	<p>Policy SP11 has regard to Development in the Green Belt where, at part 2(b) it refers to support for development relating to film, television and related production at Bovingdon Airfield (Renewal Area Cy06), the details of which are provided in greater detail in Policy DM40 : Bovingdon Airfield. Again, BPC is supportive in principle of such activities at this location.</p> <p>Section 19 of the Emerging LP has regard to <i>Managing Development in the Countryside</i> which acknowledges that the wider countryside outside of the main settlements is covered either by the Green or Rural Area policy designations, and also that part of the area is overlapped by the Chilterns Area of Outstanding Natural Beauty. BPC supports any policies that seeks to promote the protection of the countryside and to protect such areas from unnecessary and inappropriate development.</p> <p>Bovingdon lies within the Green Belt and, at present, the boundary of that designation is tightly drawn around the built-up area of the village. All of the land that has been promoted for development around the village will require the release of land from the Green Belt. In order to assess the potential impact that such release will have upon the purposes of including land within the Green Belt as defined within para.134 of the NPPF (and also stated in para.19.5 of the Emerging LP), it is necessary to review the boundaries of the Green Belt in the light of those purposes.</p> <p>The Borough Council has undertaken such a review, the conclusions of which have informed the development strategy for the Emerging LP and for Bovingdon in particular. BPC acknowledges that there will be a need to release some land from the Green Belt in order for the village to grow which will help to alleviate known infrastructure and community issues that currently exist within the settlement. As such, BPC supports the limited release of land at Grange Farm for housing and other purposes within the Plan period of the Emerging LP.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS15148
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>The Guiding Development policies do not give sufficient weight to preserving the Green Belt. The NPPF makes it clear that development in the Green Belt is “inappropriate”. The National Planning Policy Framework 2019 (NPPF) paragraph 143 notes that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances:</p> <p>‘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.’ (para 144)</p> <p>The main considerations are the effect that developments have on the openness and purposes of the Green Belt, the character and appearance of the area, and whether any harm is outweighed by other considerations which would justify the development.</p> <p>Taking any benefit of the proposed developments into account, the harm to the Green Belt on the Growth Areas in Northchurch has not been “clearly outweighed”, and very special circumstances do not exist to justify allowing the “inappropriate development”.</p> <p>In addition, NPPF, paragraphs 133-147, emphasise the fundamental aim of the Green Belt to prevent urban sprawl by keeping land permanently open. Dacorum’s Guiding Development policies do not give sufficient weight to preventing urban sprawl. As a result, the proposed developments in Northchurch ‘sprawl’ into Berkhamsted.</p> <p>The Guiding principles do not justify building in the Green Belt and fail to prevent urban sprawl.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS15292
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Managing Development in the Countryside comment	<p><u>Chapter 19 : Managing Development in the Countryside</u></p> <p>The policies in this Chapter are supported, in principle, by TCE. Particular points to note are:</p> <ul style="list-style-type: none"> • <u>Paragraph 19.1</u> : The Plan should make it clear that ‘countryside’ policies do not apply to land within the adopted development allocations of the Plan • <u>Policy SP11 : Development in the Green Belt.</u> The Crown Estate welcomes the proposal to exclude all of the North Hemel Growth Area from the Green Belt and the proposed detailed boundary shown on the Policies Map. <p>1 GDP 2 SUP</p> <p><u>Chapter 20 : Delivering Great Places</u></p> <p>These policies are supported by The Crown Estate.</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS15461
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	

Managing Development in the Countryside comment	SEE ATTACHED RESP
Included files	
Title	Managing Development in the Countryside
ID	EGS15592
Person ID	1271610
Full Name	MR SIMON MILLIKEN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Managing Development in the Countryside comment	<p>1. MDC 2. SUP – GRBT, EMPL, CY02</p> <p>EH Smith SUPPORT the inclusion in Policy SP11 (Point 2) that the Council will support the principle of development in the Green Belt in order to help meet Borough-wide strategic commercial objectives on the former Bovingdon Brickworks (Growth Area Cy02)</p>
Included files	
Title	Managing Development in the Countryside
ID	EGS15609
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 * No	Yes
Managing Development in the Countryside comment	<p>Section 19 Managing Development in the Countryside</p> <p>Policy DM39 deals with development in Wigginton and 3 other small villages in the Green Belt. In one way it is less restrictive than the current Policy CS6 in that limited infilling, which currently is understood to mean not more than 2 additional dwellings, will in future have no such specific limitation. It will however be subject to a number of criteria such as being in a gap in an existing frontage, on the same building line and not include backland development. Infilling will also be limited to housing whereas currently it includes local facilities to meet the needs of the village (such as a village shop)</p> <p>No such restrictions apply to Aldbury despite it also being in the Chilterns AONB.</p> <p>The reasons given for this are to allow greater flexibility towards the levels of new housing development in Aldbury and the potential difficulty of controlling development in the Green Belt. However, as they are both in the Chilterns Area of Outstanding Natural Beauty there is an obvious argument for treating these villages the same. Furthermore, the evidence {Urban Capacity Study, Appendix C) that the consultation is based on suggests no such difficulty has been encountered in controlling development in either of these two villages. {Only 3 new dwellings in total were approved within the village envelopes of these two villages during the 2006 to 2020 study period)</p> <p>The unequal treatment of Wigginton compared with Aldbury has also been raised in the past. In 2002, the Inquiry Inspector removed infilling as a restriction for Wigginton and 3 other small villages but Dacorum has subsequently allowed it to creep back in. The inspector's conclusion was "I consider that the restriction of infilling to a small gap in an otherwise built-up frontage is unduly onerous bearing in mind the character of the villages. Limiting development to gaps in an otherwise built-up frontage is unduly restrictive. Many of the villages are characterised by a much more complex pattern of development, especially close to their core. Within this context new infill development could in some cases be accommodated on "backland " sites without detriment to the character of the village or to the openness of the Green Belt"</p> <p>The WPC supports the view of the 2002 Inquiry Inspector which should be given in evidence for equal treatment when the 2020-2038 Local Plan is submitted.</p>

The Wigginton village envelope is not at all clear on the Proposals Map due to the scale used but it appears to be the 2002 version currently in use. Local Plan village envelope boundaries are however no longer considered definitive as case law has established that they need to be assessed 'on the ground'. The Dacorum position (Background Topic Paper Green Belt and Rural Area) is that the current **village envelope should be used as a starting point for any such assessment. However, the current version is out of date as it is now nearly 20 years old and contains some anomalies such as the inclusion of the recreational ground. Dacorum therefore now ought to undertake an 'on the ground' assessment to take into account developments such as the village shop and publish a revised version** to be incorporated into the new Local Plan. One obvious solution to the uncertainty caused by the case law would be to make the 4 selected small villages 'inset' rather than being 'washed over' by the Green Belt. This would also make the envelope boundaries much more sustainable as any future 'on the ground' assessment challenges under case law would no longer be relevant as that case law does not apply to Green Belt boundaries.

Included files

Title Managing Development in the Countryside

ID EGS15672

Person ID 1272282

Full Name Plato Estates

Organisation Details c/o DLP Planning

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Managing Development in the Countryside comment

- We support paragraph 11 which states that the Plan seeks to protect the Green Belt from inappropriate development but acknowledges that development is required on a limited number of sites washed over by the Green Belt *“in order to meet a variety of identified and essential local and strategic need over the Plan period and where there is limited scope for suitable, alternative non-Green Belt locations”*.

Included files

Title Managing Development in the Countryside

ID	EGS15674
Person ID	1272282
Full Name	Plato Estates
Organisation Details	c/o DLP Planning
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Managing Development in the Countryside comment	<ul style="list-style-type: none"> We object to Policy DM39 ('Limited infilling in Selected Small Villages in the Green Belt') on the grounds that it does not correctly interpret NPPF paragraph 145(e) which states that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt exceptions to this are...limited infilling in villages". The purpose of this policy is to ensure that villages are given opportunities to "grow and thrive, especially where this will support local services" (NPPF, paragraph 78). The NPPF does not specify which types of villages this policy should apply to because it is intended to apply to all villages that are defined as such. By incorrectly restricting the interpretation of NPPF paragraph 145(e) to certain types of villages in Policy DM39, this prevents limited infilling in other Green Belt villages where such development may be needed to support these communities by providing essential services or meeting locally identified needs. The settlement of Cow Roast for example is defined by a settlement boundary on the Local Plan Proposals Map, and as such should be recognised as a village within the settlement hierarchy to which Policy DM39 should apply. In order to align with the NPPF, the first paragraph of Policy DM39 should be removed and the wording of the policy should be amended by removing the word 'selected' so that the policy applies to all small villages in the Green Belt, as follows: <p><i>"Policy DM39 – Limited infilling in Selected Small Villages in the Green Belt</i></p> <ol style="list-style-type: none"> <i>The policy will apply to all Green Belt villages defined in the settlement hierarchy the following villages:</i> <i>Chipperfield b. Flamstead c. Potten End d. Wigginton</i> <i>Planning permission will be granted for limited infilling within these selected small villages in the Green Belt provided that it meets all of the following criteria..."</i> <ul style="list-style-type: none"> These changes will ensure that Policy DM39 is in accordance with the NPPF.
Included files	

20 Delivering Great Places responses

Title	Delivering Great Places
ID	EGS55
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<u><i>empowering communities</i></u> While the Grand Union Canal and its enviroment will be protected and promoted as a recreational and environmental resource are the any actual plans to build more mooring berths along the Dacorum stretch of the canal? If so could there be a site set up to promote canal trips prompting a section for tourism ref section 15.
Included files	
Title	Delivering Great Places
ID	EGS93
Person ID	1255447
Full Name	Andrew Sparrow
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS262
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS283
Person ID	1258939
Full Name	Ed Shedd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Delivering Great Places comment	<p>Comment on SP13</p> <p>We would like to see net environmental benefits being much higher up the agenda. There seems to be very little about how creating a Great Place to live, work or socialise could a) be built upon higher environmental standards and b) drive higher environmental benefits. For example, the replacement of hard landscaping with soft. The creation of natural water management solutions, which will help mitigate flood risk in a hotter climate, providing lakes and green landscapes which can be enjoyed by the community. These green initiatives reducing the demand for social care and policing in parallel. The Great Places policies feel overly conservative, rather traditional in approach.</p> <p>20.5 & 20.7: If heritage assets are an irreplaceable resource, why does the Local Plan say so little about the measures that will be taken to ensure that the CAOB and Ashridge Estate for example will be improved and protected? We understand that the focus of the local plan has to be primarily on the areas in which the new development needs to be undertaken. But there appears to be a lack of detail, could we say understanding, of how those new developments will affect the environment and communities around them, and how heritage assets will be protected and improved. Surely this is just as much integral to local design standards as the new developments are?</p> <p>20.10 How will these Review Panels work and how will they have the power to influence development design?</p>
Included files	
Title	Delivering Great Places
ID	EGS291
Person ID	1258731
Full Name	Tony Broadbent
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Sections 20.37 and 20.38 talk about 'opportunity areas', and 'intensification areas'. Please could you better signpost precisely where these are (both physical location, and where in the documentation), or if they are yet to be finalised. I note the 'Tall and Taller Buildings SPD' is yet to be produced, which perhaps is the answer.
Included files	
Title	Delivering Great Places

ID	EGS358
Person ID	1259924
Full Name	Bassil Aslam
Organisation Details	
Agent ID	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Support is given to Policies SP13, DM41, and DM42, with reference to the proposed Housing site being put forward for consideration by the Council in Flamstead ie. Land lying to the West of Chequers Hill.
Included files	
Title	Delivering Great Places
ID	EGS377
Person ID	1260058
Full Name	Redbourn Parish Council
Organisation Details	
Agent ID	1260042
Agent Name	David Mitchell
Agent Organisation	Redbourn Parish Council
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	

Title	Delivering Great Places
ID	EGS411
Person ID	1260241
Full Name	BASSIL ASLAM
Organisation Details	
Agent ID	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Support is given to Policies SP13, DM41, and DM42, with reference to the proposed Housing site being put forward for consideration by the Council in Flamstead ie. Land to the East of Chequers Hill.
Included files	
Title	Delivering Great Places
ID	EGS469
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	

Title	Delivering Great Places
ID	EGS556
Person ID	1148711
Full Name	Mrs Sophie Groombridge
Organisation Details	Designing Out Crime Officer Hertfordshire Constabulary: Crime Prevention Design Service
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	<p><u>Hertfordshire Constabulary comments – crime prevention and security</u></p> <p>By using Designing Out Crime techniques and ensuring that building developments achieve the police preferred minimum security standard: Secured by Design (SBD), secure, safer and sustainable environments are created; providing a better quality of life for the residents living in the area. Commercial/industrial sites, footpaths, play areas, retail units, landscaping, car parking areas and lighting can all be designed to reduce criminal activity and the fear of crime, and have a significant impact on anti-social behaviour.</p> <p>There are also substantial environmental benefits to Designing Out Crime; research indicates that the annual carbon cost of crime in the UK is approximately 6,000,000 tonnes of CO2. Independent academic research suggests that housing developments built to the Secured by Design standard have 25% less criminal damage, 25% less vehicle crime and 87% less burglary. Incorporating crime prevention and security considerations into the local plan would help to align police and planning department efforts in the future to provide safer environments for living, working and leisure.</p>
Included files	
Title	Delivering Great Places
ID	EGS607
Person ID	1261122
Full Name	Mark Slade
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS634
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	<p>Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.</p> <p>My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.</p> <p>The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.</p> <p>Tring is a commuter town and a (significant) proportion of new inhabitants will likely commute to London on a trainline already at capacity. Station car parks are full before rush hour is over - where is the proposal to increase that capacity? You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is</p>

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 Great Places

ID EGS691

Person ID 1249904

Full Name Mrs Christine Ridley

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS717
Person ID	1261251
Full Name	Lesley Ashden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Good objectives, I hope they are fulfilled!
Included files	
Title	Delivering Great Places
ID	EGS745
Person ID	1261250
Full Name	Christina Thompson
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	As a result of the coronavirus pandemic planning for new homes needs to take into account the needs of households for their own garden space at higher levels than current planning space levels allow.
Included files	
Title	Delivering Great Places
ID	EGS754
Person ID	211245
Full Name	Ms Jody Conibear
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	The Great Places ambition is admirable but the execution will be contradictory against the volumes of new builds in the overall plan thus leading to a highly congested and much less green environment. The quality of life in Dacorum will undoubtedly reduce significantly. The ambition is dependent upon strong governance of new build planning, high standards of regulation and standards checks and outstanding planning and workmanship by construction companies (which is in short supply in this country today). Rigorous implementation checks will be needed across all areas to make sure that this is correctly implemented.
Included files	
Title	Delivering Great Places
ID	EGS879
Person ID	1261462
Full Name	S LAU

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>Re: Policy SP13. Space standards should be adopted to ensure the quality of new homes are meeting criteria of net area, access to outdoor space, balconies.</p> <p>Re: Policy DM41. The target number of new homes set out by the policy will drive a lot of development to be either tall or taller buildings. There should be a clear designated areas for taller clusters and minimise the risk of random taller massings that and not in keeping with the area being proposed. There isn't a clear description in the policy showing a coherent approach in how to meet the new home demand whilst controlling the amount of taller buildings being proposed in the borough.</p>
Included files	
Title	Delivering Great Places
ID	EGS889
Person ID	1261484
Full Name	Simon Wraight
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>Ref 20.2: "It must also recognise the intrinsic qualities, characteristics and setting of our towns and villages."</p> <p>The rolling green hills surrounding these towns are the intrinsic qualities and characteristics that people love about living here. How can any mass development that wipes these out be done without severely affecting them?</p>

Included files	
Title	Delivering Great Places
ID	EGS901
Person ID	1207313
Full Name	Andy Instone
Organisation Details	Senior Historic Environment Advisor Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>It is regrettable that the county council's historic environment team who are the archaeological advisors to Dacorum have not been consulted during the preparation of this document. The draft plan is muddled, inconsistent and not as effective as it could be in conserving and enhancing the historic environment of the Borough and contributing to sustainable development. It also lacks local distinctiveness and seems to be trying to achieve this by having a variety of different policies to cover areas which often overlap and are therefore confusing. The text also requires revision, for example in some places it assumes heritage assets to just include historic buildings, in others it is muddled in its discussion of Areas of Archaeological Significance, which we note are not shown on any of the maps in the Plan. Both the policies and accompanying text lack a thread of archaeological background and mainly repeat the NPPF rather than considering what makes the Borough's historic environment distinctive. For example, what is the type and significance of heritage assets in the Borough? What types of heritage assets might we expect to find? As well as significance, what Local value might various heritage assets hold? We suggest this could be better achieved via a smaller number of clear policies which include local archaeological information that makes the policy (and therefore the Local Plan) itself distinctive and effective thereby complementing the guidance of the NPPF rather than repeating it. We recommend that there is also a requirement for access to a suitable repository to store archaeological archives and make them available to the public. This is because Dacorum currently doesn't have a museum and the storage it has is full up.</p> <p>We recommend that the Local Plan should encourage any new development to reference the local architectural styles and building materials. This should be sympathetic to historic buildings of the area, both in the surrounding Chilterns as well as reflecting the Borough's historic settlements and the New Town. This will help the Borough be distinctive and create a sense of place and enable development to sit appropriately within the local area (west Herts/Chilterns). Where possible historic buildings should be kept and maintained to compliment and inspire this.</p>

The expected scope and content of Heritage Impact Assessments which the Local Plan proposes to be submitted with development proposals should be clarified (paragraph 20.49). This is because the information required to enable the planning authority to make an informed decision regarding the historic environment is more clearly contained in existing document types such as archaeological desk-based assessments, historic building assessments and Conservation assessments. As the archaeological planning advisors to the Borough the county council believes this lack of clarity has the potential to affect the relevance of archaeological information which is submitted with planning proposals.

Many of the other sites will require archaeological assessment prior to the submission of a planning application since they have the potential to contain heritage assets which may be a constraint on development.

Included files

Title Delivering Great Places

ID EGS946

Person ID 1205804

Full Name Mrs B. Watson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment Density should be kept as low as possible everywhere and there should be less high rise flats allowed.

Included files

Title Delivering Great Places

ID EGS1130

Person ID 1143779

Full Name Ms Julia Marshall

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS1244
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS1268
Person ID	1261930
Full Name	Chris Gee
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>The towns of Kings Langley, Berkhamsted and Tring retain a community feel to them and are culturally, historically and visually unique in the borough. The citing of such large numbers of new dwellings to these towns will not recognise the intrinsic qualities, characteristics and setting of our towns and villages. The Dacorum plan presently proposes a 55% dwelling increase allocated for Tring, a small market town of mostly historic / 1930s - 1980's properties, not in keeping with modern unsympathetic developments. It would irrevocably distort and impact their characters, no matter how much effort is taken to blend them in. Grove Road would effectively become the borderline between two quite separate communities.</p> <p>Rather it would be better to distribute the dwellings around many of the villages adding 50-100 properties to many of these will not significantly alter the nature of these villages. This would allow for a more graded spread of new properties throughout the borough, in a sensitive and integrated manner. Much of the redistribution could be attached to Hemel Hempstead, a modern town, with some remaining new builds incorporated into the historic towns of Berkhamsted, Tring and Kings Langley in a more harmonious, integrated and sympathetic manner.</p>
Included files	
Title	Delivering Great Places
ID	EGS1317
Person ID	772477
Full Name	Mr. Roy Warren
Organisation Details	Planning Manager Sport England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Policy SP13: Delivering High Quality Design

Policy SP13 is supported as it requires all development to be in accordance with a range of principles that support active lifestyles especially principle 7 “Active and Healthy”. This is consistent with Government policy in section 8 of the NPPF and Sport England’s Active Design guidance.

Included files

Title Delivering Great Places

ID EGS1337

Person ID 1145350

Full Name Mr Edward Murray

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

Delivering Great Places comment

Included files

Title Delivering Great Places

ID EGS1508

Person ID 1262216

Full Name George Godar

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS1584
Person ID	1260507
Full Name	Michael Burbidge
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>Increasing the height and density of housing will change the character of the towns. Higher density housing should be built to a high quality with adequate sound insulation and balconies. There needs to be adequate (preferably underground) parking. There is little evidence of this in current developments.</p> <p>There also need to be space to house the large number of waste bins that we are expected to have. If not these will, as is the case in many terraced streets, end up on the pavement making walking much more difficult.</p>
Included files	
Title	Delivering Great Places
ID	EGS1648
Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS1797
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	SP13 I Support the highest quality in Design DM41 For Tring Town I believe that it would be inappropriate to allow "Taller" buildings. DM43, DM46 and DM47 I support the policies. The historic fabric is particularly important in Tring Town.
Included files	
Title	Delivering Great Places
ID	EGS1817
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>It does not appear to me that the council wish to deliver great places and raise design standards. It appears that the council would like to work in isolation and hide from the public as much as possible.</p> <p>There has been little chance to engage with the public on this local plan. It appears to me that the timing has deliberately set to coincide with Christmas and a lockdown which everyone new was likely to happen.</p>
Included files	
Title	Delivering Great Places
ID	EGS1899
Person ID	488516
Full Name	mr hugh siegle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS1922
Person ID	1262553
Full Name	Henry Wallis

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS1940
Person ID	1262244
Full Name	Estelle Wraight
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	We already have GREAT places, we don't need to change the identity of our town and tourn it into another London suburb. We live in the countryside for a reason.
Included files	
Title	Delivering Great Places
ID	EGS2027
Person ID	1262604
Full Name	Ray Smith
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	20.15 The dismissal of Northchurch as an urban ribbon development of Berkhamsted in this document demonstrates that DBC has no understanding of local context and cannot be trusted to do anything to preserve our village, let alone improve life here.
Included files	
Title	Delivering Great Places
ID	EGS2031
Person ID	1262601
Full Name	Anne Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Potential developers of Lockfield site (BK07) would find it difficult to deliver on a number of the design principles. A glut of houses will not reinforce local character, any development would be distinctive by its very difference to the semi rural environment it would be placed. A place for all would be difficult to achieve, the difficulties presented by the road and pavements will make the Lockfield site problematic for people with physical disability to access from and with families with young children. Lockfeild would not be a connected place, contained within the boundaries of railway, canal and a busy narrow road.
Included files	
Title	Delivering Great Places
ID	EGS2062

Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS2124
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Developing Great Places. All of the policies may sound good but in reality are very rarely adhered too by developers as we have already seen around Britain. One slip of the axe and a great tree is lost and no amount of fine and a baby tree can replace 100s of years of growth. The town has already had to fight to keep trees that were under threat of the chop for a TEMPORARY car park which wasn't even going to be a permanent fixture. There is nothing about this plan which will deliver a great place just ruin the lovely one we have.
Included files	
Title	Delivering Great Places

ID	EGS2175
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Both Dunsley Farm and the Station Road/Bulbourne Road (124) developments are huge assets to Tring and, in particular, are fundamental parts of Tring's intrinsic qualities and characteristics. Your plans fall over badly on this section.
Included files	
Title	Delivering Great Places
ID	EGS2272
Person ID	1262925
Full Name	Nandipha Jordan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan. In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.

Included files	
Title	Delivering Great Places
ID	EGS2297
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>'Delivering Great Places' lacks punch given the overall damage this Plan will do to the setting of Berkhamsted.</p> <p>It is noted that paragraph 20.10 states that <i>"We have also set up a Community Review Panels as a way of facilitating early active engagement to ensure the development delivers high quality design and empowering communities and we will look to expand these further."</i></p> <p>This would suggest that DBC are pro-actively engaging with communities, but this is not BRAG's experience in recent years. BRAG worked very closely with DBC through the development of the Core Strategy and the Public Inquiry, when BRAG attended more sessions than any other independent body.</p> <p>However, subsequent to the 2017 'Issues and Options' Consultation DBC have failed to engage with BRAG – evidenced by their failure to reply to emails. This is not the actions of a public body who wish to engage with the community.</p> <p>BRAG also has grave misgivings about the 'masterplan' procedures. None of the developments in Berkhamsted have completed as their masterplans dictated, with developers being allowed to change often major elements to the detriment of the development and the town as a whole.</p> <p>Indeed, BRAG was involved in the original masterplan for Hanburys. That site has yet to be developed but that original masterplan has been ripped up and replaced without involving the community.</p> <p>To be clear, developers rarely intend to stick to the masterplans that gain them permissions and historically DBC have displayed a lack of rigor to enforce those masterplans.</p>
Included files	
Title	Delivering Great Places

ID	EGS2346
Person ID	1261830
Full Name	alistair budd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	This is a really crucial area which can mitigate so much in a development especially in sensitive areas such as the greenbelt . Please do not accept the mediocre ,developers can and do build to great designs . Future generations will commend say the developement of the old Coopers site in Berkhamsted .Whilst being appauled that anyone would have allowed say the development of the Chiltern park extension which backs onto New road and acts as a blot on the northern valley side overlooking Northchurch .
Included files	
Title	Delivering Great Places
ID	EGS2387
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Why are you not proposing to provide <i>additional</i> "beautiful, enduring and successful places" elsewhere in Dacorum, rather than damaging further those that already exist? Nobody believes that growing the population of Tring by 55% will

deliver on the aspiration, the focus should be on developing new locations or enhancing small towns into beautiful desirable places to live for the future.

Included files

Title Delivering Great Places

ID EGS2421

Person ID 1227518

Full Name Mr John LOWRIE

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment The plan destroys great places like green belt

Included files

Title Delivering Great Places

ID EGS2447

Person ID 1262981

Full Name Chris Mabley

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment	In the absence of the planning for the future paper being any more than a white paper, it is wrong to say planning can be accelerated for high quality development etc when all the terms are subjective. A developer will tell you his plan complies with the highest standards, the people next door will say the opposite. Having clear forms is not the same as objective criteria and the views of the community are never likely to coincide with the profit margins of house builders. Design Review Panels are not necessarily representative of the communities most affected by a proposal eg Thakeham will be popular with areas of South Berkhamsted but not East Berkhamsted and definitely not Bourne End. Consultation needs to demonstrate modification of proposals in line with input from all parties to the consultation otherwise it is just a formality to tick a box.
Included files	
Title	Delivering Great Places
ID	EGS2608
Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS2777
Person ID	1262722
Full Name	Colin McCready
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS2881
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 * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS2934
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS2962
Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>20.17 (1)/ Table 25. I would argue that in order to determine the character of an area it is essential to ask local residents about their perceptions of the look and feel of the character of the area as it stands. ie it may be classified as urban, but does it feel urban? Such a survey could be relatively small scale but it should inform the early build design and be carried out by an independant survey group. This requirement should be included in this section.</p> <p>20.17(4) Add a fourth point - For larger development s(over 10 dwellings) a 3D model actual or virtual showing local context and land form should be available to view before the design is approved.</p> <p>SP13 - A Distinctive Place - I have grave concerns about this description. An eyesore is a distinctive place but not a desired outcome. A more appropriate term would be 'A Comparable Place' or 'A Compatable Place'.</p> <p>2) This should include a reference to inclusion of private garden space. The emphasis on compactness encourages builders to provide no garden space at all.</p> <p>6) High quality home should include reference to at least one reasonable sized garden (front or rear) in family homes. We do not want to see a return to the provision of back yards only.</p>

(8) Disappointed to see, yet again, that the preservation or enhancement of biodiversity is not specified as an outcome - it is a separate issue to facing the climate crisis but could be included in this section. Even tall buildings can have minor adaptations to improve biodiversity eg the high-rise Bucks County Council building in the centre of Aylesbury has a Peregrine Falcon nesting platform installed near the top of the building.

DM41 (c) I have concerns that taller buildings as high as six storeys will generally be supported in towns. Each building should be considered on its merits but the character of Market town centres is generally incompatible with in my view with heights of more than four storey. I strongly object to more than three storeys on the peripheries of towns and other areas of Dacorum as it should be restricted to two where the view is otherwise compromised. The only justifiable exceptions should be where the sight line and view is predominantly shielded by mature existing trees or topography. I would exclude from this existing industrial and employment areas the Maylands development where taller buildings already exist.

Therefore in Table 27 Elsewhere in towns - up to 3 storeys and Elsewhere in Dacorum should not have a tick, but the comment - subject to compatibility with the local character and screening

The tall buildings in the centre of Hemel Hempstead are an eyesore despite attempts to improve their appearance. I am not in favour of similar construction in any town centre. Any tall building in an industrial area should have considerable character in its design - like a post office tower or gherkin - square boxes are not sufficiently characterful.

DM42 - Agreed

DM43 - This should include the requirement that large sites and smaller development sites where there is suspected of being a heritage asset, whether known to and recognised by Historic England or not, must have at least an independent desk-based historical survey carried out, followed by a field based survey and Heritage Impact Assessment if there is evidence that such an asset may exist.

20.58 - Agreed

DM44 - (1) This should specify inclusion of a method to enable finds of heritage assets or suspected heritage assets to be reported to the Council by the public on an ongoing basis rather than rely on periodic consultations. (2) Inclusion of an example here would help clarify matters. I recommend that 'Rural Hedges Over 100 years old' are added here as the example.

DM45 - Where a Desk Based assessment has already been carried out (eg as has that includes BK06) and there is evidence that an unscheduled or previously unrecognised archaeological or heritage asset exists, the field based assessment should be carried out prior to approval of the development (including consideration of release of Green Belt for development) so as not to prejudice the outcome for that asset.

DM46 (3) Please include that 'Organisations or groups with an appropriate interest must be invited and facilitated to remove, take off site and conserve structures and features destined for demolition prior to demolition to avoid valuable assets of significance to future generations being lost forever.' This concept should also apply to features of listed buildings that would be damaged or removed as part of the proposed modifications.

DM48 - Agreed

DM49 - So long as the ecological considerations including minimising disruption to wildlife, particularly during the breeding season take priority.

(3) A buffer strip adjacent to the canal for the protection of wildlife should be a requirement specified in this policy.

Included files

Title Delivering Great Places

ID EGS2996

Person ID 1012318

Full Name Mrs Jane Hennell

Organisation Details Area Planner
Canal and River Trust

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment

Policy DM 44 Non designated assets

The Canal & River Trust wish to be involved in work on the SPD and ask the council to consider whether the Grand Union Canal needs formal recognition as a NDHA in any area where it is not already a designated asset.

DM49

The Canal & River Trust is pleased to note that the council feel it is appropriate to include a policy relating to the canalside environment. However we suggested at the issues and options stage that the council work with the Trust to create this Policy. We suggest that such a meeting takes place to review both the policy and text to ensure that our aspirations align before the next stage of the local plan in order to avoid the Trust needing to raise objections to this policy. In particular we wish to discuss issues relating to the supporting text, and section 2 of the policy (moorings) and how this would relate to policy DM 15 and our own published guidance.

Good waterside design (Section 3) should refer to a section on waterside design to be included within the Detailed Design Guide SPD as suggested in our response to that document and could refer to our own current guidance which can be found here and forthcoming guidance which will be made available as soon as possible.

Section 4 should include car parking facilities to allow visitors and those using the waterspace such as anglers and paddlers to park safely. The provision of facilities for water based pursuits could be encouraged within all new canal side allocations.

Included files

Title Delivering Great Places

ID EGS3233

Person ID 1263566

Full Name Frances Read

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Delivering Great Places comment

Included files

Title Delivering Great Places

ID EGS3280

Person ID 1262255

Full Name AJ W

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment	It is difficult to believe in the commitment of DBC to engage the communities given that this Growth Strategy has only been under consultation for a period where the majority do the residents that this will directly impact have been unable to give anything outside their day to day any bandwidth and it is likely that this may have passed people by given that we have been in the midst of a global pandemic.
Included files	
Title	Delivering Great Places
ID	EGS3367
Person ID	1263693
Full Name	Ruth Colderwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS3384
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS3431
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>The Plan states regarding Canalside Environment: “20.75-80 Proposals to improve the canal side environment and leisure facilities are identified in a number of locations...The Grand Union Canal represents a major recreational resource running through the Borough and has potential to provide for further rural pursuits and water-based activities.... The GUC and its environs will be protected and promoted as a recreational and environmental resource by joint action with the Canal and River Trust and other agencies.”</p> <p><i>Comment: In this context, the early stage proposals by Chilterns canoe and Rafting Club (who also run Paddle Boarding) to develop a canal side boathouse and base facility to support its activities and growing membership/participation would be compatible and beneficial to these policies and strategies. Further support to other water-based sports clubs (such as canoe clubs Scuba and Angling clubs) would also be welcomed.</i></p>
Included files	
Title	Delivering Great Places
ID	EGS3451
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Delivering Great Places requires full consultation with local communities. History suggests that this has been sadly lacking in respect of Berkhamsted. History also suggests that developers often ignore the masterplan and DBC have seemed reluctant to enforce those plans. For example, the plan for Hanburys where the original masterplan hgas been replaced without involving the local community.
Included files	
Title	Delivering Great Places
ID	EGS3508
Person ID	1263810
Full Name	David Tolfree
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS3597
Person ID	1145631
Full Name	Mr Alastair Greene

Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS3613
Person ID	1263865
Full Name	Robin McMorran
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	What a load of overinflated management-speak. How exactly do you "Embed environmental sustainability" into destroying the green belt?
Included files	
Title	Delivering Great Places
ID	EGS3660
Person ID	1263890
Full Name	Chris Munday

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	It is clear that you have not considered this in anyway in terms of Tring. The aim seems to be to build a new Leighton Buzzard in Dacorum
Included files	
Title	Delivering Great Places
ID	EGS3662
Person ID	222269
Full Name	Georgina Tregoning
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS3723
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	Outdated, houses not needed and destroying the green belt is not the right way to do it
Included files	
Title	Delivering Great Places
ID	EGS3732
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS3795
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	How does the creation of urban sprawl contribute to great places? It doesn't. It ruins them. Protect the market towns and villages from sprawl. Invest in the large towns and urban centers that need redevelopment and housing.
Included files	
Title	Delivering Great Places
ID	EGS3876
Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS3944
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS3981
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS4009
Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Delivering Great Places comment	20.9 - Do residents get to comment on the DDG prior to approval? 20.12 - Define early engagement
Included files	
Title	Delivering Great Places
ID	EGS4026
Person ID	1207786
Full Name	Anne Foster
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	More meaningless unacheivable words Having been involved with the Community Panel process, run by an outside agency with limited scope - its reference here sounds like a box ticking exercise Masterplanning carries little weight with Berkhamsted citizens given the failure of previous Masterplans to deliver. Once planning permission is granted there seems little will to enforce Masterplans or even conditions imposed as part of an application. Take Bearroc 1 - the playing pitches built as part of the developer obligations were conditioned to be available for use before first occupation - 3 years on they are still not in use. There are many more examples.
Included files	
Title	Delivering Great Places
ID	EGS4093
Person ID	1264201

Full Name	Philip Hughes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>20.22 says 'Promoting higher buildings in key parts of Dacorum is a central part of our strategy to create more sustainable development'</p> <p>Tall buildings are bad for many reasons, why are they part of the strategy? Who in Dacorum wants tall buildings? They have a negative visual impact, for example the HH08 Station Gateway area would ruin Boxmoor common if taller buildings were constructed. Very dense buildings in terms of dwellings per area of land create traffic problems. Does anyone who lives in the borough actually want to live in a tower block? If we have to build more homes, they should be suitable for families, not miserable tower blocks.</p> <p>20.28 States 'However, tall and taller buildings will not be appropriate in all locations, particularly sensitive areas such as within or close to conservation areas or listed buildings. ' However, the plan for HH08 includes taller buildings, despite being adjacent to Boxmoor comon and the canal beauty spots.</p> <p>20.37 States 'Tall and taller buildings are considered appropriate in principle in the opportunity areas of Hemel Hempstead Town Centre, Two Waters and Maylands Local Centre.' - Who considers this appraite? I certainly don't, and I suspect most residents of these areas don't either.</p> <p>No tower blocks in Dacorum please!</p>
Included files	
Title	Delivering Great Places
ID	EGS4119
Person ID	1264210
Full Name	Fiona Fulford
Organisation Details	myself
Agent ID	1264200
Agent Name	Fiona Fulford

Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	No 8 (climate crisis) should be higher up the priority list
Included files	
Title	Delivering Great Places
ID	EGS4149
Person ID	1262892
Full Name	Jean Farrer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	You don't seem to be addressing g the NPPF 20.5. The market towns of Berkhamsted and Tring are heritage assets - partly because of their rural settings. I support the One Voice Alliance submission on this section.
Included files	
Title	Delivering Great Places
ID	EGS4214
Person ID	1263248
Full Name	Johnjo McDermott
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>This seems like a land grab and lip service is paid to how this will be achieved</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 (www.lichfield.uk).</p> <p>... there must be a binding commitment for affordable homes in the plan. Too often developers have been allowed to wriggle out of this commitment. Tring is not suitable for this kind of increase in population:</p> <p>... there is no capacity for more footfall at the station, the car park gets full and the trains to London overcrowded (based on pre-covid numbers).</p> <p>... the High Street is unsuitable, as the main throughfare from east to west Tring the High Street is narrow and overcrowded for both traffic and pedestrians at peak times. The structure of the High Street has subsided with the current levels of traffic, this will only get worse.</p> <p>... under the current proposals Tring bears the brunt of new housing with more homes than other towns in Dacorum (percentage terms).</p> <p>... there are currently electric vehicle charge points in Forge car park and at Tesco, this is clearly insufficient for a town the size of Tring. Environment</p> <p>... the plan should allocate land for new allotments for the residents so they can grow their own fruit and vegetables.</p> <p>... the plan must commit to increase habitat for wildlife, including wildlife corridors and re-wilded areas to increase bio-diversity.</p> <p>... there should be recreational corridors built into the plan to promote cycling and walking in a safe environment, they should be wide with natural vegetation and not narrow alleyways.</p> <p>Sustainability</p>

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

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

Summary

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

Included files

Title Delivering Great Places

ID EGS4267

Person ID 1264269

Full Name Paul de Hoest

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

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

Included files

Title Delivering Great Places

ID	EGS4322
Person ID	1264321
Full Name	David` Fox
Organisation Details	personal
Agent ID	1264318
Agent Name	David Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	If this is a priority list then in my view No 8 (climate crisis) should be higher up
Included files	
Title	Delivering Great Places
ID	EGS4337
Person ID	1264325
Full Name	Olivia Halper
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	20.10: Community Review Panel narrative is not correct. We have established a CRP (singular) and will not be looking to expand further as this covers the whole Borough. 20.11 Need to refer to the Community Review Panel – since good design is that which meets the needs of local communities.

DRP and CRP: these are just referred to in narrative under Delivering Great Places, and need to be referred to in policy. Use of these panels is key to delivering high quality development.

SP13: 'Principle Category' is now renamed 'theme' in the SDG.

Included files

Title Delivering Great Places

ID EGS4382

Person ID 1261609

Full Name DEBORAH CROOKS

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Delivering Great Places comment

Included files

Title Delivering Great Places

ID EGS4463

Person ID 1264316

Full Name Melanie Turner

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS4507
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS4532
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

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

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

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

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

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

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

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

Failure to Provide Adequate Supportive Infrastructure

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

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

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

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

Similarly, increasing the number of dwelling by over 1,800 in the Berkhamsted area will result in a considerable increase in vehicular traffic through the centre of the town – a route that is already heavily congested at peak times at the A4251

/ A416 junction and along the High Street. This is due to the historic layout of the town along a valley with steep sides meaning there are only these two roads into and through the town.

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

Impact on Green Belt and Other Designated Land

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

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

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

You are now faced with a personal choice.

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

Included files

Title	Delivering Great Places
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ID	EGS4584
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Person ID	1145918
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Full Name	Mr Richard Tregoning
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Organisation Details

Agent ID	
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Agent Name	
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Agent Organisation	
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Yes / No	No
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* Yes	
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* No	
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Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS4716
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS4822
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS4881
Person ID	1264519
Full Name	Neil Burton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Delivering great places simply will not happen. The evidence is quite clear by looking at all of the recent developments. Are the flats in the marlowes a great place to live? I can't think of 1 development where the greed of making money has not taken precedence over a good design. Possibly the 'best' development in recent times was Nash Mills but that sees insufficient parking and houses/flats squashed in to make maximum gains. These developments will be high rise, will not respect the environment and will be at the developers discretion on what to build. Time and time again, the council has allowed eyesores to be built (Kodak being one of the worst) due to the developers 'giving back' to the community or helping to pay for additional services like road laying/lighting. These developments will end up being modern day ghettos. We have already seen in the plan that the low level station development has gone to 8 stories then back to 4. If granted, the developers will push for as much as possible and the council will either 'work with them' or have no powers to stop it.
Included files	
Title	Delivering Great Places
ID	EGS4882
Person ID	1264524
Full Name	Karen Kang
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS4981
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent ID	1264539
Agent Name	Bethan Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	If this is a priority list, then in my view No 8 (climate crisis) should be higher up the list. It will ultimately impact all on the list after all.
Included files	
Title	Delivering Great Places
ID	EGS5004
Person ID	1264545
Full Name	Sally Mclver
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Great places are green. The local countryside is irreplaceable. There is no justification for building on our greenbelt and reducing its boundaries.
Included files	
Title	Delivering Great Places
ID	EGS5064
Person ID	1264258
Full Name	Fintan FitzPatrick
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan. In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.
Included files	
Title	Delivering Great Places
ID	EGS5106
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 * No	Yes
Delivering Great Places comment	I support the rationale behind SP13. It is a shame such policies were not introduced earlier. In Policy DM41 I am opposed to the use of buildings of more than three storeys except within the most urban parts of Hemel Hempstead. I support DM44 and would cite Tring Local History Museum as a classic instance of a non-designated asset which is deserving of protection.
Included files	
Title	Delivering Great Places
ID	EGS5135
Person ID	1264550
Full Name	Kevin Fielding
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS5144

Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Delivering Great Places I like the idea of Hemel Garden Communities; beautiful houses, well designed sustainable, with green spaces, local good schools and GP surgeries and everyone walking or cycling to work; in other words a new town like Milton Keynes. But not on Green Belt.
Included files	
Title	Delivering Great Places
ID	EGS5172
Person ID	1264509
Full Name	Hannah Fox
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places

ID	EGS5227
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	If this is a priority list, then in my view No 8 (climate crisis) should be higher up the list
Included files	
Title	Delivering Great Places
ID	EGS5265
Person ID	1175740
Full Name	Berkhamsted Schools Group
Organisation Details	The Berkhamsted Schools Group
Agent ID	1175743
Agent Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	
Delivering Great Places comment	Delivering Great Places This section including Policy SP13 deals with Delivering High Quality Design. As stated previously, the BSG wish to retain a sense of pride and stewardship in the quality of development that is ultimately delivered on the BK03 land and agree with the objectives for achieving high quality design and a sense of space. The detailed design criteria and height

of development on their land should be flexible having regard to site specific circumstances and would be worked up in partnership at the detailed design stage.

There is reference in the draft plan to Design guides/master-planning and this is also part of the governments wider planning reforms that were consulted upon. Elsewhere in the plan, there is a desire to deal with sites in a coordinated way. We make detailed comments on this in a later response section, but there is a real risk of unnecessary delay of delivery due to over complex and unduly wide master planning/design codes. Following the last core strategy adoption there was a detailed master planning phase for those previous green belt releases which spanned years before they could even proceed to the planning application phase. The final delivery of those sites has taken many years longer than was necessary, post plan adoption. Site BK03 is a relatively small site compared to many others and is also a relatively stand-alone site and it is available for immediate delivery. Many significant infrastructure and community benefits will flow from its early delivery and it would be inappropriate for it to be delayed, potentially by a very long period, due to detailed wider master planning and design guides. The site will deliver a very high standard of design consistent with the local immediate area and consistent with policies. BSG can influence this through the delivery partner process and DBC have control during the detailed planning application phase.

Included files	
Title	Delivering Great Places
ID	EGS5292
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS5337

Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS5371
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS5478
Person ID	1264648

Full Name	Lydia Whelan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	We need more investment in children's playareas and facilities.
Included files	
Title	Delivering Great Places
ID	EGS5487
Person ID	1264647
Full Name	Richard Burnell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS5491
Person ID	1264048
Full Name	Alison Fraser

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS5550
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS5676
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	I agree Berkhamsted and Tring are still great places to live however the proposed development in the local plan to substantially increase the size of the area and population of these two great places to live will denigrate their character and appeal in the setting of the Chilterns AONB. If Dacorum goes ahead with this local plan it will very definitely be providing a great place to live it will be delivering a worse place to live.
Included files	
Title	Delivering Great Places
ID	EGS5680
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS5688
Person ID	1261255
Full Name	Sarah Lightfoot

Organisation Details	
Agent ID	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	I support the points submitted by BRAG in relation to these policies.
Included files	
Title	Delivering Great Places
ID	EGS5727
Person ID	1258030
Full Name	Amy Harman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Dacorum has proven it does not ensure development demonstrates clear site specific masterplans which provide good quality development. You just have to look at the development on Shootersway (Baeroc Park) which sticks out like a sore thumb and does not reinforce local character. The development is generic and provides no additional services to accommodate the additional population in this locality. The Local Plan needs to address this lack of direction - Table 25 and the strategic design guide SPD is not detailed enough
Included files	
Title	Delivering Great Places
ID	EGS5737

Person ID	494828
Full Name	P Marshall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>Policy DM41 In light of knowledge gained over last year of lockdown, outdoor space is vital to maintain wellbeing in residential developments.</p> <p>I would suggest policy to mention balcony provision, internal rooftop gardens and community green space for residents. Consideration should be given to promoting vertical gardens on the taller buildings such as Bosco Verticale in Milan and other projects worldwide.</p> <p>On the otherhand taller buildings but also buildings above 3 stories should be heavily regulated in light of their ability to dominate surroundings and citify town centres such as Berkhamsted and Tring.</p>
Included files	
Title	Delivering Great Places
ID	EGS5750
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	

Included files	
Title	Delivering Great Places
ID	EGS5849
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Sounds lovely. Again, I raise the point of what we have now and how that will be improved. I am very concerned that there will potentially be an 'Us' and 'Them', the old and the new. I fully appreciate that Integrating new developments into existing spaces is always a challenge. I would like to see more about how this potential barrier will be addressed.
Included files	
Title	Delivering Great Places
ID	EGS5876
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Just amazed DBC thinks residents will not actually read the words then look at the actual plans and conclude DBC was not actually looking to deliver great places to live and work.

The change in peoples attitudes to higher concentrations of development post Covid world are being discussed as people migrate (if they can) away from larger towns and cities to places like Tring and Berkhamsted, precisely because of their market town size. Lets not ruin it please DBC.

Included files

Title Delivering Great Places

ID EGS5889

Person ID 1264354

Full Name Juliet Penaliggon

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment If this is a priority list, then in my view No 8 (climate crisis) should be higher up the list

Included files

Title Delivering Great Places

ID EGS5978

Person ID 1264750

Full Name Neil Joyce

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment	<p>With any development it is essential that the character of any building fits in with the current towns and is sympathetic in maintaining their individual character. Large scale developments in Tring will totally alter the perception and feel of the town and community. The relatively recent flats built on Brook Street opposite Silk Mill Way are an example of buildings that are excessively tall for the town, and stark in character; totally unsuitable for a small, low level town, and definitely not affordable housing.</p> <p>The heritage of Tring is vital to the ambiance of the town. The impact of the Rothschilds can be seen throughout the town, and developments such as the proposal on the cattle market will take away both a historic space and a building of importance (the museum).</p>
Included files	
Title	Delivering Great Places
ID	EGS5986
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	The council have historically allowed developers to make substantial changes to masterplans, without local consultation, to the detriment of the development and surrounding area. Rigid, unalterable controls and standards must be effortlessly ensure top quality developments with minimal environmental damage.
Included files	
Title	Delivering Great Places
ID	EGS6111
Person ID	1264816
Full Name	Christopher Nicholls
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	It would appear the great places are being destroyed by this development.
Included files	
Title	Delivering Great Places
ID	EGS6131
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	6 storeys, nicely designed without colourful cladding might be OK in town environment but should over shadow local character which is very important. Do not spoil the views. Point 2 very relevant.
Included files	
Title	Delivering Great Places
ID	EGS6204
Person ID	1264872
Full Name	Ben Penaliggon
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	If this is a priority list, then in my view No 8 (climate crisis) should be higher up the list
Included files	
Title	Delivering Great Places
ID	EGS6224
Person ID	1261819
Full Name	Alex Rathmell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6257
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6325
Person ID	1261257
Full Name	Simon Tuff
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	20.13SP13table 2520.2220.3820.27DM4920.8020.78Map 44p319
Included files	
Title	Delivering Great Places
ID	EGS6395
Person ID	1262933
Full Name	James Cunningham
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6467
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	NPPF is not enough to deliver the great places aspiration
Included files	
Title	Delivering Great Places
ID	EGS6485
Person ID	1264936
Full Name	Jane Cracknell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6592
Person ID	1263380
Full Name	Martin Warden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6610
Person ID	1265007
Full Name	Duncan Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6626
Person ID	1264908
Full Name	Henry Smart
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Your document says all the correct things but will it prevent the mistakes that have been made in the past such as building too close to Buncefield oil depot?
Included files	
Title	Delivering Great Places
ID	EGS6663
Person ID	1264697
Full Name	Nicholas Wood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6702
Person ID	1265019
Full Name	Yvonne Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	I endorse the response of the chiltern countryside group
Included files	
Title	Delivering Great Places
ID	EGS6805
Person ID	1265036
Full Name	Tom Burrows
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6835
Person ID	1261827
Full Name	Ian Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<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>Really?!!</p> <p>I endorse the response from the CCG</p>
Included files	
Title	Delivering Great Places
ID	EGS6839
Person ID	1265072
Full Name	Peter Barker
Organisation Details	Me
Agent ID	1264829
Agent Name	Peter Barker
Agent Organisation	

Yes / No * Yes * No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6921
Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6926
Person ID	1264453
Full Name	Fiona Hinton
Organisation Details	Myself
Agent ID	1264426
Agent Name	Fiona Hinton
Agent Organisation	

Yes / No * Yes * No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6943
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS6984
Person ID	1265105
Full Name	Jonathan Tay
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS7124
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS7141
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
Delivering Great Places comment	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate.
Included files	
Title	Delivering Great Places
ID	EGS7216
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS7246
Person ID	1264956
Full Name	Caroline Heard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Delivering Great Places comment	
Included files	
Title	Delivering Great Places
ID	EGS8224
Person ID	1207978
Full Name	Alison Sexton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	Secondly, many elements of the Dacorum local plan talk about retail units on the ground floor. Perhaps this was written before the Covid-19 pandemic? I strongly believe that these elements should be reconsidered, it seems clear that the retail landscape has changed forever and with significant numbers of empty retail units particularly within Hemel Hempstead we should completely re-think any town centre developments, it seems unlikely that any new retail units will be required, it may take years to refill the ones which have been vacated in recent months. The same goes for more industrial type proposals, particularly for instance at HH16. Is this type of development actually needed? We already have a lot of unused space in the Maylands Avenue area, it would be better to use this land before destroying a green area which is so near to Roughdown Common and one feels could not help but contaminate that protected area.
Included files	
Title	Delivering Great Places
ID	EGS8550
Person ID	211354
Full Name	Mrs Laura Sanderson
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>As I said at the beginning of my comments, DBC have failed miserably to consult adequately about any of this Plan and the pandemic cannot be regarded as an excuse for not contacting every household about proposals which have such a major impact on their communities and quality of life.</p> <p>DBC have not engaged with BRAG in recent years even though they worked closely on the Core Strategy and the Public Enquiry.</p> <p>This is not a council that is responsive or one that listens.</p> <p>DBC do not enforce masterplan procedures. None of the developments in Berkhamsted have completed as their masterplans dictated, with developers being allowed to change often major elements to the detriment of the development and the town as a whole. Why does DBC not penalise these developers or enforce the Planning Regulations? This is not acceptable governance.</p>
Included files	
Title	Delivering Great Places
ID	EGS8680
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	<p>Development Affecting the Historic Environment</p> <p><u>Historic Environment</u>. It is considered that the supporting text within this section is somewhat muddled and currently lacks local The associated policies appear to cover areas that often overlap and is not therefore as effective as they should be in terms of conserving and enhancing the historic environment of the borough and contributing to sustainable development.</p>

This section of the plan needs to be revised in the light of the above. For example in some places it assumes that heritage assets simply includes historic buildings and in other areas, the text is muddled in its discussion of Areas of Archaeological Significance, which it is noted that they are not shown on any of the inset maps that accompany the plan. Both the policies and accompanying text lack a thread of archaeological background and mainly repeat the NPPF rather than considering what makes the borough’s historic environment distinctive.

It is therefore considered that the supporting text and policies within this section of the plan need to outline the type and significance of heritage assets in the Borough, the types of heritage assets might may be expected to be found. As well as significance, what local value might various heritage assets hold, should also be mentioned. It is suggested that this could be better achieved via a smaller number of clear policies which include local archaeological information that makes the policy (and therefore the Local Plan) itself distinctive and effective thereby complementing the NPPF rather than repeating it. It is also recommended that there is a requirement for access to a suitable depository to store archaeological archives and make them available to the public, as the borough currently doesn’t have a museum and the storage it has is full

It is also recommended that the local plan should encourage any new development to reference the local architectural styles and building materials of the borough. This should be sympathetic to historic buildings of the area, both in the surrounding Chilterns as well as reflecting the borough’s historic settlements and the new town. This will help the borough be distinctive and create a sense of place and enable development to sit appropriately within the local area (west Herts/Chilterns). Where possible, historic buildings should be kept and maintained to compliment and inspire this.

Paragraph 20.49

Historic Environment. It is expected that the scope and content of Heritage Impact Assessments which the local plan proposes to be submitted with development proposals should be This is due in part to the information required to enable the planning authority to make an informed decision regarding the historic environment is more clearly contained in existing document types such as archaeological desk-based assessments, historic building assessments and conservation assessments. As the archaeological planning advisors to the LPA, the county council believes this lack of clarity has the potential to affect the relevance of archaeological information which is submitted with planning proposals.

Policy SP13: Delivering High Quality Design

Public Health. This policy has the potential to deliver multiple benefits for health through the design outcomes and principles it sets out. Most, if not all of the principles could be linked directly back to a desired outcome of walkable neighbourhoods and high levels of active and sustainable travel. The policy might benefit from making explicit reference to this given the co-benefits for health outcomes, environmental sustainability, air quality etc.

Transport. The county council will welcome transport impacts being recognised within this section and policy and would support working on including transport aspects within the proposed Detailed Design Guide SPD.

Included files

Title

Delivering Great Places

ID	EGS8816
Person ID	1158356
Full Name	Colin Blundel
Organisation Details	Planning Officer Chiltern Society
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>Policy SP13 - Delivering High Quality Design - The Society supports this policy.</p> <p>Policy DM41 - Height of Buildings – The Society supports this policy as it provides a method for meeting more of the housing need within sustainable locations in urban areas, thus helping to reduce the need for development in the Green Belt and/or AONB. Taller buildings provide opportunities for more dense development, including more affordable and starter homes, which are desperately needed in the Borough. However, there is a need to safeguard the setting of listed buildings and historic sites from high buildings.</p> <p>Policy DM43 - Historic Environment - The Society supports this policy.</p> <p>Policy DM44 - Development Affecting Non-Designated Heritage Assets – The Society would like to see this policy make more reference to the importance of historic landscapes. With a long history of habitation, the Chilterns contains many landscapes which should be considered of historic importance.</p> <p>Policy DM46 - Conservation Areas - The Society supports this policy.</p> <p>Policy DM47 - Listed Buildings - The Society supports this policy.</p>
Included files	
Title	Delivering Great Places
ID	EGS9158
Person ID	211352
Full Name	Mr Andrew Sanderson
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>As I said at the beginning of my comments, DBC have failed miserably to consult adequately about any of this Plan and the pandemic cannot be regarded as an excuse for not contacting every household about proposals which have such a major impact on their communities and quality of life.</p> <p>DBC have not engaged with BRAG in recent years even though they worked closely on the Core Strategy and the Public Enquiry. They do not reply to emails. As I know myself.</p> <p>This is not a council that is responsive or one that listens.</p> <p>DBC do not enforce master plan procedures. None of the developments in Berkhamsted have completed as their master plans dictated, with developers being allowed to change often major elements to the detriment of the development and the town as a whole. Why does DBC not penalise these developers or enforce the Planning Regulations? This is not acceptable governance.</p>
Included files	
Title	Delivering Great Places
ID	EGS9311
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	
Delivering Great Places comment	<p>Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan.</p> <p>In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.</p>
Included files	
Title	Delivering Great Places
ID	EGS10457
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Delivering Great Places comment	<p>We call that for every acre of Green Belt land which is developed at least 2 acres is rewilded and planted with locally sourced trees with public right of way. Such land should be protected from development for future generations.</p> <p>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)</p> <p>Nature should be incorporated into the design of each new development.</p>
Included files	
Title	Delivering Great Places
ID	EGS10681

Person ID	1161079
Full Name	Melanie Llewellyn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>As I said at the beginning of my comments, DCB have failed miserably to consult adequately about any of this Plan and the pandemic cannot be regarded as an excuse for not contacting every household about proposals which have such a major impact on their communities and quality of life.</p> <p>DCB have not engaged with BRAG in recent years even though they worked closely on the Core Strategy and the Public Enquiry. They do not reply to emails. As I know myself.</p> <p>This is not a council that is responsive or one that listens.</p> <p>DCB do not enforce masterplan procedures. None of the developments in Berkhamsted have completed as their masterplans dictated, with developers being allowed to change often major elements to the detriment of the development and the town as a whole. Why does DCB not penalise these developers or enforce the Planning Regulations? This is not acceptable governance.</p>
Included files	
Title	Delivering Great Places
ID	EGS10742
Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Delivering Great Places comment	<p>Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan.</p> <p>In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.</p>
Included files	
Title	Delivering Great Places
ID	EGS11019
Person ID	1268908
Full Name	Molly Berry
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>There are great opportunities here for mini forests, green corridors, community allotments and local facilities in each development. Cycleways are of course, a must, to keep bikes separate from cars where ever possible, and I'm sure you will want to incorporate EV charging points, as well as local bus routes.</p> <p>Please don't hesitate to get in touch for more ideas on how to make this plan the most environmentally friendly and ecologically sound developments possible at this time.</p> <p>The future must be green!</p>
Included files	
Title	Delivering Great Places
ID	EGS11446
Person ID	1264362
Full Name	Juliet Miller

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets.</p> <p>There should be a programme to actively identify non-designated heritage assets during the period of the local plan.</p> <p>In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.</p>
Included files	
Title	Delivering Great Places
ID	EGS11597
Person ID	1269148
Full Name	SIMON AND ANNA BARNARD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	SP13 - High Quality Design - surely this should go without saying! Dacorum has suffered for too long from poorly designed buildings which fail to reflect the character and scale of existing buildings.

Policy DM41 - Height of Buildings – Whilst the provision of higher buildings in urban areas may be acceptable, protection of the character and appearance of the surrounding development, especially listed and other historic buildings and open spaces, is of paramount importance. High buildings should not be accepted just to ‘add interest’. This should not be achieved by good architecture! High buildings should not be proposed along the ridges of the valley.

Policy DM44 - Development Affecting Non-Designated Heritage Assets – The importance of historic landscapes should be more widely recognised and emphasised. With a long history of habitation, the Chilterns contains many landscapes which should be considered of historic importance. E.g. ancient hedgerows, rural lanes, settlement patterns.

Included files

Title Delivering Great Places

ID EGS11685

Person ID 1269212

Full Name PETER SCOTT

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Delivering Great Places comment Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan. In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.

Included files

Title Delivering Great Places

ID EGS11890

Person ID	1269277
Full Name	DEFINE PLANNING AND DESIGN LTD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>POLICY DM43 – HISTORIC ENVIRONMENT:</p> <p>Policy DM43 requires development proposals to “<i>preserve and where appropriate enhance the historic environment.</i>” That policy, however, conflicts with NPPF paragraph 196, which states that “<i>where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.</i>” The policy should be amended to remove that requirement and state that any harm to the historic environment will be considered in accordance with the NPPF.</p> <p>POLICY DM44 – DEVELOPMENT AFFECTING NON-DESIGNATED HERITAGE ASSETS:</p> <p>Policy DM44 states that development affecting non-designated heritage assets should “<i>seek to conserve and where possible enhance their significance.</i>” That requirement is, however, in conflict with NPPF paragraph 197 that states that “<i>in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage assets.</i>” Thus, the policy should state that any harm to non-designated assets will be considered in accordance with the NPPF.</p> <p>POLICY DM46 – CONSERVATION AREAS:</p> <p>Policy DM46 states that new development in Conservation Areas will be permitted provided that they preserve or enhance the area’s special interest, character and appearance, and that development proposals outside a Conservation Area which affect its setting will be considered likewise. That policy is not in accordance with NPPF paragraph 196, which allows less than substantial harm to the significance of designated heritage assets should the public benefits outweigh that harm. Thus, Policy DM46 should refer to the NPPF specifically.</p> <p>POLICY DM47 – LISTED BUILDINGS:</p> <p>Policy DM47 states that proposals that affect the setting of a Listed Building “<i>will only be permitted where the setting of the building is preserved</i>” (at requirement 3). As above, requiring that the setting of listed buildings to be preserved is not in accordance with NPPF paragraph 196, which states that “<i>where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.</i>”</p>

Included files	
Title	Delivering Great Places
ID	EGS12133
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	
Delivering Great Places comment	1 Delivering Great Places Policies SP13 & DM 41 to DM49 No objections
Included files	
Title	Delivering Great Places
ID	EGS12336
Person ID	1269489
Full Name	STEVE HILL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Delivering Great Places 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 Great Places
ID	EGS12439
Person ID	1146040
Full Name	Mrs Rachel Macdonald
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	<p>Delivering Great Places</p> <p>Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan.</p> <p>In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.</p>
Included files	
Title	Delivering Great Places
ID	EGS12878
Person ID	1269665
Full Name	Mr Martin Hicks
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>20 Delivering Great Places</p> <p>Policy SP13 - Delivering High Quality Design is supported, notwithstanding the obvious conflict between development and reinforcement of local character.</p> <p>Policy DM43 - Historic Environment is supported.</p> <p>Policy DM44 - Development Affecting Non-Designated Heritage Assets is supported. However, it is too late for the historic livestock market in Tring which met all of the criteria outlined in Table 28 (similar to those required previously for spot listing) and was considered borderline for national listing as a result of numerous representations when proposed for development in a previous local plan. Consequently, I have little or no confidence in this policy ever achieving anything.</p> <p>Policy DM47 - Listed Buildings is supported.</p> <p>Policy DM49 - Canalside Environment and Recreational Moorings is supported.</p>
Included files	
Title	Delivering Great Places
ID	EGS12895
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 Great Places comment	Policy DM 41 Height of Buildings

It would seem unlikely that buildings of more than 2 storeys would be acceptable in the conservation area of Markyate, but it is interesting that no policy is given on extension into the roof space of one and two storey buildings. This is a common way of enlarging a property, and can be quite overpowering. Further, bungalows are often appropriate homes for older people; a policy to restrict roof extensions in bungalows should be considered, if not for existing properties maybe for new builds. The Parish Council would welcome clarification on these issues.

Development Affecting the Historic Environment Policy DM43 - Historic Environment

Policy DM44 - Development Affecting Non-Designated Heritage Assets

Markyate not only has a central conservation area with a number of listed buildings, but also Markyate Cell, within Cell Park (A former owner caused great confusion by renaming the house Cell Park) which has grade II* listing for the house, grade II for the kitchen garden walls and the park is listed too. As in many places, in the mid 20thcentury a number of very important heritage assets were destroyed. The Parish Council welcome the protection proposed in the Dacorum Local Plan to preserve our heritage.

Canalside Environment

Policy DM49 Markyate Parish Council is pleased to see that the Dacorum Local Plan

Includes intent to make more use of the opportunities offered by the canals but it should be noted that the canals are there to provide navigation with a secondary statutory use for angling. Nearby accommodation needs to be provided with this in mind. The towpath too is there first for boaters and anglers, but CRT advertises ‘Share the space’ on the towpaths, the Dacorum Local Plan should recognise and endorse this.

Included files

Title Delivering Great Places

ID EGS13053

Person ID 1270013

Full Name Mr Daniel Ritchie

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment	<p>Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets.</p> <p>There should be a programme to actively identify non-designated heritage assets during the period of the local plan.</p> <p>In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.</p>
Included files	
Title	Delivering Great Places
ID	EGS13418
Person ID	1270229
Full Name	Homes England
Organisation Details	
Agent ID	1270231
Agent Name	Ms Rebecca Dewey
Agent Organisation	Associate Director WSP
Yes / No * Yes * No	
Delivering Great Places comment	<p>SP13 - Delivering High Quality Design</p> <p>In support of the policy direction but make a suggestion as to how the policy could be strengthened further.</p>
Included files	
Title	Delivering Great Places
ID	EGS13419
Person ID	1270229

Full Name	Homes England
Organisation Details	
Agent ID	1270231
Agent Name	Ms Rebecca Dewey
Agent Organisation	Associate Director WSP
Yes / No * Yes * No	
Delivering Great Places comment	<p>CHANGES TO THE LOCAL PLAN</p> <p>Homes England welcomes the references to design quality and the opportunities to deliver quality design. The test of soundness requires plans to be consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.</p> <p>Paragraph 129 of the NPPF makes reference to Building for Life. This design tool has now been updated to Building for a Healthy Life (https://www.udg.org.uk/publications/othermanuals/building-healthy-life).</p> <p>We would suggest that a definition could be added to the Glossary</p> <p><u>Building for a Healthy Life (BHL)</u></p> <p>Building for a Healthy Life is a Design Code to help people improve the design of new and growing neighbourhoods. BHL updates England’s most widely known and most widely used design tool for creating places that are better for people and nature. The original 12 point structure and underlying principles within Building for Life 12 are at the heart of BHL.</p> <p>The new name reflects changes in legislation as well as refinements made to the 12 considerations in response to good practice and user feedback. It also recognises that this latest edition has been written in partnership with Homes England, NHS England and NHS Improvement.</p> <p>BHL integrates the findings of the three-year Healthy New Towns Programme led by NHS England and NHS Improvement. In line with the policy objective.</p>
Included files	
Title	Delivering Great Places
ID	EGS13549
Person ID	1260521

Full Name	Steve Ritchie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan. In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.
Included files	
Title	Delivering Great Places
ID	EGS13683
Person ID	1207133
Full Name	Chilterns Conservation Board
Organisation Details	Chilterns Conservation Board
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	SP13 Delivering High Quality Design and design policies DM41-48. Object. The CCB considers that these policies (especially SP13) should make explicit reference to the Chilterns Buildings Design Guide and a requirement that its provisions should be applied with regard to all development proposals in the AONB

and, preferably, its setting. The Guide, and its supporting technical notes, should at be included in the supporting guidance here.

Included files

Title Delivering Great Places

ID EGS13848

Person ID 1270387

Full Name Mr Richard Pilkinton

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Delivering Great Places comment In the mid 20thcentury a number of very important heritage assets were destroyed. It is good to see that there is more appreciation and protection offered now. However, I am concerned that infilling behind existing buildings in the core of Markyate, and other places built with frontages directly onto a road, will create many dangerous entrances from between the houses and exacerbate problems of congestion and on-street parking. Although we are not close to the Grand Union Canal and Tring reservoirs, I am disappointed that the Borough Council does not promote them as a facility for recreation, while remembering that the towpaths, locks and adjacent facilities are there for the users of the canal. Any new developments nearby need to be designed with this in mind.. CRT advertises 'Share the towpath', they should not be permitted to become short cuts for cyclists to speed along.

Included files

Title Delivering Great Places

ID EGS13863

Person ID 611689

Full Name Mrs Sheila Pilkinton

Organisation Details Markyate Parish Council

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	In the mid 20th century a number of very important heritage assets were destroyed. It is good to see that there is more appreciation and protection offered now. However, I am concerned that infilling behind existing buildings in the core of Markyate, and other places built with frontages directly onto a road, will create many dangerous entrances from between the houses and exacerbate problems of congestion and on-street parking. Although we are not close to the Grand Union Canal and Tring reservoirs, I am disappointed that the Borough Council does not promote them as a facility for recreation, while remembering that the towpaths, locks and adjacent facilities are there for the users of the canal. Any new developments nearby need to be designed with this in mind.. CRT advertises 'Share the towpath', they should not be permitted to become short cuts for cyclists to speed along.
Included files	
Title	Delivering Great Places
ID	EGS13898
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	Delivering Great Places Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets. There should be a programme to actively identify non-designated heritage assets during the period of the local plan. In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.
Included files	

Title	Delivering Great Places
ID	EGS14054
Person ID	1264962
Full Name	Courtney Culverhouse
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	Delivering Great Places - For every acre of Green Belt land that is developed, 2 acres is rewilded and planted with locally sourced trees with public right of way. Such land should be protected from development in the future. The Local Plan should allocate land for new allotments for residents of new homes, as well as laying out gardens.
Included files	
Title	Delivering Great Places
ID	EGS14257
Person ID	1152075
Full Name	Rob Wakely
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets.

There should be a programme to actively identify non-designated heritage assets during the period of the local plan.

In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.

Included files

Title Delivering Great Places

ID EGS14370

Person ID 1270640

Full Name Geoffrey Llewellyn

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment DBC do not enforce masterplan procedures. None of the developments in Berkhamsted have completed as their masterplans dictated, with developers being allowed to change often major elements to the detriment of the development and the town as a whole. Why does DCB not penalise these developers or enforce the Planning Regulations? This is not acceptable governance.

Included files

Title Delivering Great Places

ID EGS14527

Person ID 1270690

Full Name Akzo Nobel CIF Nominees Ltd

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	<p>Our client notes the Government's recent 'Supporting housing delivery and public service infrastructure' consultation which closed in January 2021. In light of COVID19 and the pressures on the vitality of High Streets, including the uncertainty of office and retail floorspace demand, our client supports the proposed new Permitted Development right for the change of use from Class E to residential (C3) with no size limit and it would apply to Conservation Areas. This would offer additional flexibility and help deliver new homes in urban areas, particularly in town centres. That said, our client is mindful of the need for comprehensive development as part of the regeneration of town centres, including Berkhamsted High Street, as opposed to piecemeal development and smaller Permitted Development and minor applications coming forward independently at different times. In respect to design, our client supports the detailed design principles and requirement for high quality design that reflects local character as set out under Policy SP13. The Council should amend Policy SP13 to clarify what schemes will qualify for the Council's Design Review Service. In respect to development heights and tall buildings, our client supports Policy DM41 which directs taller buildings to the town centres. Land at 168-192 High Street, Berkhamsted has potential to accommodate a tall or landmark building to rear of the Site, subject to necessary detailed design, townscape visual impact and heritage analysis.</p> <p>Our client is committed to preserving and where possible, enhancing the historic environment in respect to Land at 168-192 High Street, Berkhamsted. It is acknowledged that the proposed scheme must be in-keeping with the character and appearance of Berkhamsted Conservation Area and preserve the significance and not cause substantial harm to the adjacent heritage assets in accordance with the NPPF and Policies DM43, DM44, DM45, DM46 and DM47. In the interests of soundness, these draft policies should make specific reference to the NPPF (chapter 16).</p>
Included files	
Title	Delivering Great Places
ID	EGS14552
Person ID	1270698
Full Name	Ms Elizabeth Hamilton
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	Policy DM49 also fails to reference the setting of the Chilterns AONB. The large-scale housing site proposed on the edge of Tring alongside the Grand Union Canal is also contrary to this policy.
Included files	
Title	Delivering Great Places
ID	EGS14761
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	5.3 The aspiration of Policy SP13 Delivering High Quality Design is generally supported. The policy refers to the Dacorum Design Guidance document to which comments have been submitted. 5.4 Policies DM43 – 47 are concerned with heritage assets. These policies should all accord with relevant national policy, in particular NPPF Section 16.
Included files	
Title	Delivering Great Places
ID	EGS14843
Person ID	325470
Full Name	Gardener Family Trust

Organisation Details	Gardener Family Trust
Agent ID	1270807
Agent Name	Mr Alistair Brodie
Agent Organisation	Henry H Bletsoe & Son LLP
Yes / No * Yes * No	
Delivering Great Places comment	<p>20 Delivering Great Places - We believe that our clients' land could provide an opportunity to provide a high quality development, incorporating a distinctive built environment on land which is bounded on two sides by existing housing development.</p> <p>Paragraph 20.47 Development Affecting the Historic Development - We would stress that the land which we are promoting does not comprise a designated heritage asset nor is it adjoining such an asset. It form a residual area of farmland the majority of which was sold for development decades ago.</p>
Included files	
Title	Delivering Great Places
ID	EGS14961
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 Gorbng
Yes / No * Yes * No	

Delivering Great Places comment	Delivering great places HCC welcomes the guidance in relation to building heights within Growth Areas, whereby Policy DM41 guides that these will be dictated by site specific masterplans.
Included files	
Title	Delivering Great Places
ID	EGS14974
Person ID	1207224
Full Name	Chris Padley
Organisation Details	Environment Agency
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p><u>Delivering Great Places</u></p> <p>Policy DM41 – Height of Buildings</p> <p>We suggest an additional point is included within this policy which references managing risks to groundwater resources associated with deep piled foundations that are typically required for tall buildings. Deep piles may need to penetrate into geologic layers including Chalk Principal Aquifers, creating preferential pathways for contamination and the potential to cause pollution to a controlled water. This is in line with paragraph 170 of the NPPF.</p> <p>We would like it to be recognised that the height of buildings along rivers needs to be addressed here. Over shading of rivers can cause issues to rare chalk stream habitats and development proposals should be mindful of this.</p> <p>Proposed wording could include:</p> <p><i>'h. proposals shall demonstrate how they will make a positive contribution to and protect the locally important features such as;</i></p>

1 *protected and designated views (either strategic or contained urban views) (development will be assessed for its impact on the designated view - if it falls within the foreground, middle ground or background of that view);*

1 *Dacorum Panoramas;*

iii. the setting of Landmarks, other important vistas and skylines

1 *ecologically sensitive receptors such as the Rivers Gade, Bulbourne and Ver and the Grand Union Canal (by minimising the impacts of overshadowing, negative wide effects and microclimate changes) and groundwater (by minimising potential pollution to groundwater).*

We are pleased to see the inclusion of this policy. Please note that some stretches of the Grand Union Canal are also classified 'Main River' where the River Bulbourne and River Gade join the canal. In these sections our requirements (and your local plan policy Policy DM33 – Protection and Enhancement of the River Character and Water Environment requirements) should also apply.

Point 3 of the policy should also refer to making a positive contribution to WFD objectives, as development near watercourses, the Grand Union Canal will affect water quality. Potential wording could include:

1 *All development adjoining the Grand Union Canal will be expected to make a positive contribution to the canalside environment and Water Framework Directive objectives. The design, scale and materials of new developments and canalside facilities must be appropriate to the environmental and historic character of the canal, and have no adverse impact on its nature conservation interest. Important views both to and from the canal should be*

Included files

Title Delivering Great Places

ID EGS15062

Person ID 1270849

Full Name Ms Jessica Lindfield

Organisation Details St William Homes LLP

Agent ID 210999

Agent Name Mr
Martin
Friend

Agent Organisation Director

Vincent & Gorbing

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

Delivering Great Places comment

DELIVERING GREAT PLACES

St William shares the objectives of the Council in delivering 'great places' and raising design standards. This is essential to ensure that the level of development that is required in the DESG can be successfully delivered. Overall, policies (and supporting Supplementary Planning Guidance) need to be sufficiently flexible to ensure innovative approaches to design on each site that comes forward for development, taking full account of its context and the need to optimise sites to deliver the scale of development envisaged in the plan.

Tall and Taller Buildings

St William support Policy DM41 – Height of buildings, which recognises that in the Opportunity Area in Hemel Hempstead (including in Two Waters), tall and taller buildings will be supported. It is fundamental to the level of growth that is required that buildings that are taller than the buildings presently in the Opportunity Areas are promoted in order to optimise the use of land as part of the overall strategy of delivering the required level of new homes, particularly as this is likely to be greater than the DESG presently. The definition of "taller" (up to approximately 6 storeys) and "tall" (meaning higher than this) seems appropriate. As highlighted above, St William consider that taller and tall buildings will certainly be appropriate on the National Grid site given its context, the size of the site and its location close to public transport, services, employment and other day-to-day facilities. Accommodating taller and tall buildings on the site will be fundamental to the design-led approach to maximising the yield from development sites.

The definition of and approach to viewing corridors will be important in this context and it is noted that detailed guidance on this will be forthcoming in the Consideration of viewing corridors should take a positive approach to the creation of new landmarks through high quality design as a contribution to the creation of a legible and dynamic urban environment.

Included files

Title Delivering Great Places

ID EGS15165

Person ID 1270925

Full Name Mrs Kathryn Salway

Organisation Details Extinction Rebellion Dacorum

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>Delivering Great Places</p> <p>Taller buildings should be prioritised over releasing areas of green belt land when aiming to meet house building targets.</p> <p>There should be a programme to actively identify non-designated heritage assets during the period of the local plan.</p> <p>In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.</p>
Included files	
Title	Delivering Great Places
ID	EGS15316
Person ID	1250151
Full Name	Andrew Marsh
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	<p>Development affecting the historic environment</p> <p>-</p> <p>While we note and support policies DM43 - DM47 in relation development affecting the historic environment, these are hidden away in chapter 20 'Delivering Great Places' where they could be missed. We recommend a reordering of the Plan so that 'Development affecting the historic environment' is a chapter in its own right.</p>
Included files	

Title	Delivering Great Places
ID	EGS15462
Person ID	1271103
Full Name	GRAHAM RITCHIE
Organisation Details	FAIRFAX STRATEGIC LAND (HEMEL) LTD
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	SEE ATTACHED RESP
Included files	

Title	Delivering Great Places
ID	EGS15534
Person ID	1271381
Full Name	Alison Walker
Organisation Details	Associate Director of Strategic/Large Projects Thakeham Homes
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<ul style="list-style-type: none"> Thakeham would like to highlight inconsistencies between the wording within Policy DM41 and wording in Table 27 of the supporting text to the Policy. Table 27 states that building heights of up to three storeys will be acceptable in all areas of the Borough, however Item e.i. of Policy DM41 limits this to two storeys 'elsewhere in Dacorum'.

- We suggest that Item 1.e.i. of Policy DM41 is updated in line with Table 27 to state 3 Whilst Thakeham understands the importance of ensuring new developments are of an appropriate scale and massing, it is of the view the Council should not limit

2.5 or 3 storey dwellings, where these can provide additional habitable space, in order to create efficient use of land and allow the Council to meet its density requirements set out under Policy DM11.

Included files

Title Delivering Great Places

ID EGS15644

Person ID 1271974

Full Name EMILY FORD

Organisation Details SENIOR PLANNER

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Delivering Great Places comment

- In similarity with our comments on Policy DM11, we recommend that guidance on the height of buildings contained within concept framework masterplans and/or design codes for allocated Growth Areas is not overly prescriptive so as to avoid the potential for developers to design schemes at detailed design stage which respond effectively to site characteristics and market

Included files

Title Delivering Great Places

ID EGS15650

Person ID 1271978

Full Name JOANNA HARLEY

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Delivering Great Places comment	<p>Medium to large developments (estates) – <i>centred on community and quality of life</i></p> <p>Recognising that there may be proposals for some larger scale developments (which we take to be circa 100 homes and with cumulation by builder/developer) on the outskirts of town, the Council wish to see the following principles incorporated:</p> <ol style="list-style-type: none"> 1 These development should operate not just as residential areas but as discrete neighbourhoods with their own services and <ol style="list-style-type: none"> 1 Provision of a Community Hub is central - the purpose of such a provision would be to provide local shared space for meetings, social and leisure activities and rentable shared work The space would allow for the development of strong social infrastructure. <p>The effect will be to build community, reduce vehicle based travel and provide security through neighbourhood activity throughout the day.</p> <ol style="list-style-type: none"> 1 Play areas and community open areas distributed throughout the development to allow for children to play out, potentially independently and to form close local friendships. Play areas should be free of vehicle traffic and visible from the housing they 1 Diversity of housing type and tenure – developments must be mixed, to promote social cohesion and form strong <ol style="list-style-type: none"> 1 Provision for small local businesses and social enterprises to develop, to allow residents to live and work in the same locality and to improve diversity and 2 Use of Zoned Development to increase local mixed employment opportunities
Included files	
Title	Delivering Great Places
ID	EGS15721
Person ID	1273151
Full Name	Ms Megan Green

Organisation Details	Senior Planner Thakeham Homes Ltd
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Delivering Great Places comment	<p>Thakeham would like to highlight inconsistencies between the wording within Policy DM41 and wording in Table 27 of the supporting text to the Policy. Table 27 states that building heights of up to three storeys will be acceptable in all areas of the Borough, however Item 1.e.i. of Policy DM41 limits this to two storeys 'elsewhere in Dacorum'.</p> <p>We suggest that Item 1.e.i. of Policy DM41 is updated in line with Table 27 to state 3 storeys. Whilst Thakeham understands the importance of ensuring new developments are of an appropriate scale and massing, it is of the view the Council should not limit 2.5 or 3 storey dwellings, where these can provide additional habitable space, in order to create efficient use of land and allow the Council to meet its density requirements set out under Policy DM11.</p>
Included files	

21 Sustainable Transport and Connectivity responses

Title	Sustainable Transport and Connectivity
ID	EGS2
Person ID	1249466
Full Name	Mr Lawrence Stromski
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Statement 21.1 is wrong and poorly focused. The west coast mainline might serve London, but also serves Milton Keynes, Birmingham and other. Many more people might consider employment in these areas. At least acknowledging that fact in this proposal might help develop local rail plans further.</p> <p>Towns do not have reasonable access to inter-urban bus services. The number 500 Arriva bus (the “core” north/south bus through the area) ends too early southbound in order to enjoy any evening activities in Aylesbury or other. The Saturday service starts too late and ends too early to make it useful for weekend working or enjoying late leisure activities on the weekend. The Sunday bus service is practically non-existent.</p> <p>The bus is often heavily delayed due to traffic in Hemel Hempstead and other areas and the lack of available bus lanes. You are often unable to make an early connection from the 500 bus in Berkhamsted or beyond to Hemel Hempstead to connect with the Greenline or National Express coaches to major destinations.</p> <p>In statement 21.27 you say that the council encourages developers. Developers are cut-and run. They want the maximum profit and then to get out quickly with no regard for long-term transport provision. The council should "require" developers to engage more fully with the process and subsidise new local bus infrastructure.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS16
Person ID	1253652

Full Name	erica vilkauls
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	You have no control of the railways or roads so why make promises like this? be truthful - you can't ensure the infrastructure will survive this poultaiio increase. The railways was craeking this year due to the over expansion of house-building in Berkhamsted so how is this a feasible plan? It isnt!
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS57
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<i>Private transport will still have a role to play in the interim; however this should only be for essential journeysFor Council to achieve its modal share aspirations there will likely be a need for all development to make contributions towards the onsite delivery of infrastructure and/or interventions identified through the Sustainable Transport Strategies. In cases where the infrastructure cannot be attributed to particular developments monetary contributions will be sought.</i> 21.25 This statement again very draconian <u>“The private vehicle requirements of the development should not have a significant adverse effect on the wider environment and the amenity of local residents, such as through unacceptable levels of trip generation or result in displacement parking.</u> It’s not for you to decide how many trips the car user can

make and what is and isn't acceptable. As with the planned walking and cycling initiatives does this mean that area's such as lanes and small narrow roads will be no longer available to the car user???

Included files

Title Sustainable Transport and Connectivity

ID EGS84

Person ID 1255360

Full Name James Underwood

Organisation Details

Agent D 1255359

Agent Name James Underwood

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment The plans seems to lack serious and specific consideration of the road infrastructure in Berkhamsted. Paragraph 21.2 states: "The strategic and local road network can become congested, leading to delays, difficulties in accessing services during peak travel hours, and air quality issues in certain parts of the towns.", however the plan then seems to only tackle this by suggesting that residents take up more cycling and walking. This will not compensate for the amount of new traffic created by placing new homes on the edge of town.

The plan does not link to the Berkhamsted and Tring Transport Strategy and only goes in to detail about Hemel Hempstead, where it is no doubt more confident on how to build new roads on open spaces. In the area of Northchurch where I live, I would welcome new properties, however many of the current roads heading past the new suggested developments are steep single-track roads without suitable exits to trunk routes. Putting a new school and hundreds of homes in this area without widening the roads and adding a new connection to the A41 seems bound to create even more terrible congestion in an area ill-suited to the current levels of traffic.

I would suggest the plan is updated to properly link to the local strategies and that they go in to detail about how to increase road capacity in the area. Including creating new links to the A41. Otherwise the plan is lazily placing houses up against the bypass with no consideration as to the mess it would create with traffic in the area. Vague commitments to cycling more are not going to do anything to solve Shootersway Road becoming gridlocked along it's length as hundreds of new cars try to squeeze on to the A41 during the Ashlyns school drop off.

Included files

Title	Sustainable Transport and Connectivity
ID	EGS109
Person ID	1254846
Full Name	James Martin
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>The current bus service through Northchurch and Berkhamsted is not currently a viable alternative to car transport. It is not comprehensive or reliable and it is too expensive.</p> <p>The train network cannot cope with the current numbers of people. There is no mention of this in this section.</p> <p>I currently cycle to the station from Northchurch and cycle on other journeys between Northchurch and Berkhamsted, with the current traffic volumes it can be a dangerous route. The traffic volumes will clearly increase.</p> <p>The lack of a current Transport Plan to back up this plan renders it too vague to be supportable.</p> <p>The Transport plan listed is from 2013 and berkhamsted is noted as an AQMA this plan needs to demonstrate tangible ways in which air quality will be improved and not reduced.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS115
Person ID	1256427
Full Name	Katherine Hutton
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Sustainable Transport and Connectivity comment	<p>Berkhamsted town centre is extremely congested and vehicle users are given priority over sustainable modes of travel/ pedestrians. Parking in Berkhamsted should be brought in to line with other towns in Dacorum with residents permits to discourage commuters from other towns (eg Hemel) driving to Berkhamsted in order to park free of charge on streets around the station.</p> <p>Cycle routes or 'walk to school corridors' are extremely poor or non-existent in berkhamsted.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS204
Person ID	1257827
Full Name	Sheila Ashman
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Sustainable Transport and Connectivity comment	<p>21.2 However, the strategic and local road network can become congested, leading to delays, difficulties in accessing services during peak travel hours, and air quality issues in certain parts of the towns. Across the Borough bus services could be improved and railway stations require upgrading, alongside the need to expand and improve the existing pedestrian and cycle network.</p> <p>This is another sound observation and underlines why housing development should be limited in Kings Langley - and there should certainly not be a service station built at one of the busiest roads and intercections around! The traffic delays from Hunton Bridge to the M25 roundabout are heavy already at rush hour periods. Plus, I've found that friends who live nowhere near hear are familiar with "Kings Langley" because they hear it mentioned on traffic reports so often. If DBC wants to be successful in its sustainability strategy, idling cars stuck in a traffic jam is not the way forward.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS208

Person ID	1257490
Full Name	Lucy Muzio
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The roads in Hemel Hempstead and specifically surrounding this area are already overpopulated with really bad congestion, the Hemel Hempstead/Redbourn road towards St Albans and it can't cope at rush hour. How is it expected to cope when all these houses and when even more extra people are brought into the county especially with the St Albans development which is going to be added on the back of Hemel Hempstead which is going to cause even more congestion and problems and then you want to add another how many houses and cause more congestion and pollution.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS263
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Whilst I generally support efforts to encourage people to walk or cycle it must be remembered that, with an ageing population, for many people who are not necessarily disabled, cycling and extensive walking are not practicable options. It is time to get to grips with the idea of making more use of small, individual electrically powered vehicles such as bicycles, scooters and Segways. The current law demonises and bans them. This must change.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS292
Person ID	1258731
Full Name	Tony Broadbent
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>I would like to see quality new cycle paths introduced in the new development areas, and existing amenities such as the Nicky line far better maintained and promoted.</p> <p>Perhaps turn some existing roads into 'priority for cycle' routes by putting bollards in the middle (thereby creating two dead-ends to prevent through traffic), and apply appropriate paint.</p> <p>Chaulden Lane, Pochen End Lane, Fields End Lane, Polehanger lane might provide a low traffic route to the station.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS326
Person ID	1259852
Full Name	Imogen Wagstaff
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Sustainable Transport and Connectivity comment	I support the development of a good network of electric bus routes and cycle lanes within dacorum. I do not support the increased development of road networks for private cars and I am very concerned that the volume of new housing proposed will significantly increase the volume of private cars on the roads.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS359
Person ID	1259924
Full Name	Bassil Aslam
Organisation Details	
Agent D	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Support is given to Policies DM52, DM53, DM55, with reference to the proposed Housing site being put forward for consideration by the Council ie. Land lying to the West of Chequers Hill.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS378
Person ID	1260058
Full Name	Redbourn Parish Council
Organisation Details	
Agent D	1260042
Agent Name	David Mitchell
Agent Organisation	Redbourn Parish Council

Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS412
Person ID	1260241
Full Name	BASSIL ASLAM
Organisation Details	
Agent D	1259009
Agent Name	Bassil Aslam
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Support is given to Polcies DM52, DM53, DM55, with reference to the proposed Housing site being put forward for consideration by the Council ie. Land to the East of Chequers Hill.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS422
Person ID	1260386
Full Name	DR Michael Wagner
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Transport <p>We need to be investing in infrastructure that will facilitate active travel and sustainable transport. While the Plan provides some broad policy, these fall far short of a detailed plan for a network of lit footpaths, cycle ways and public transport. The Plan needs to detail these networks, so that work can start on developing them now and we can ensure that that road space and access rights are provisioned for in any developments.</p> <p>The current development plan is seeing the expansion of towns, so we need to ensure that there are active transport routes being developed to facilitate people to travel into their local towns, and ensure that enlargement does not encourage greater car use for short journeys.</p> <p>As mentioned above, it may be necessary to reconsider the 2018 Transport Plan (unfortunately the figures in this plan are at such low resolution they are not legible), in the light of potential changes to working patterns that have been precipitated by Covid.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS423
Person ID	1260386
Full Name	DR Michael Wagner
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Communications <p>It is welcome to see that there is commitment to providing gigabit capable broadband and FTTP to new developments. However, the council will need to work with providers to ensure that a fibre backbone is rolled out across the area, so that the communications capability across the Dacorum area is significantly improved.</p>

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS492
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS510
Person ID	1260803
Full Name	Rollo Prendergast
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Re. Items 21.2 and 21.3

Location, location! The planned sites will not achieve these goals. See 4. Piecemeal approach attached

Included files [4. Piecemeal approach.docx](#)

Title Sustainable Transport and Connectivity

ID EGS580

Person ID 1261006

Full Name Paul Kelly

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Sustainable Transport and Connectivity comment

Included files

Title Sustainable Transport and Connectivity

ID EGS608

Person ID 1261122

Full Name Mark Slade

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Sustainable Transport and Connectivity comment

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS635
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	<p>Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.</p> <p>My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.</p> <p>The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.</p> <p>Tring is a commuter town and a (significant) proportion of new inhabitants will likely commute to London on a trainline already at capacity. Station car parks are full before rush hour is over - where is the proposal to increase that capacity? You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by such radical numbers will result in far more congestion and pollution – flying directly in the face of your environment plan. It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.</p> <p>Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between</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.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS657
Person ID	1258939
Full Name	Ed Shedd
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment	<p>Comments on 21.15: Fully agree with the direction of travel here. We would urge that the options for bus, cycle and pedestrian transport are central to the solutions proposed for Hemel and the surrounding towns, as opposed to being somewhat peripheral. To deliver profound, not immediate change we do nevertheless need to start designing and implementing multi modal transport systems. The danger is that we focus on the "known", which in the main are road infrastructure projects, to the expense of other forms of sustainable transport and connectivity.</p> <p>Comments on Policy DM50</p> <p>Fully in support of paragraph 1. In the light of creating Hemel as an enviro-tech hub, we trust that the transport strategy is designed in the light of changing working environments for such companies. In short, that much of the task/routine work will be done remotely, very often from home, and that the office spaces are designed for more collaborative, complex tasks. That has a direct impact on how many people travel, at what time, and for what duration.</p> <p>Fully support paragraph 2, and especially 2d. Once again we trust that 2d is central to the region's thinking, and is designed into the very earliest developments in the local plan, especially in the new Garden suburbs.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS694
Person ID	1256588
Full Name	Wendy Silcock
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>The concentration on walking and cycling routes does not take into account the impact of the weather. These routes will probably be well utilised in the Spring/Summer but when the days get shorter and wetter individuals will use their own vehicles.</p> <p>I applaud the desire to improve broadband access but you then need to factor in the increase in delivery vehicles due to online ordering.</p>

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS697
Person ID	1249904
Full Name	Mrs Christine Ridley
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>21.12 <i>This will be supported by better cycling and bus routes from the town centre and Hemel Hempstead Railway Station and the provision of bus priority measures for quicker and more reliable journeys.</i></p> <p>Bus links are very important, as currently there seems to be no link between trains arriving at Hemel station and buses into the town centre, A much more frequent bus service between the station and Hemel town centre would allow more people to leave their cars at home. However, it is up to the HCC, not the DBC to arrange local transport, so is this aim yet another aspiration which may not be realised?</p> <p><i>21.2 However, the strategic and local road network can become congested, leading to delays, difficulties in accessing services during peak travel hours, and air quality issues in certain parts of the towns. Across the Borough bus services could be improved and railway stations require upgrading, alongside the need to expand and improve the existing pedestrian and cycle network</i></p> <p>Bus services across the town certainly need to be improved. I have stopped using my local buses as they are now every half an hour, and not very reliable, which means a possible wait of over an hour if the bus doesn't turn up!</p> <p>Cycle racks at all local shops (including existing local shopping areas such as Stoneycroft and Rossgate) would encourage the use of cycles for local shopping.</p> <p>Electric cars are an aspiration for the relatively near future, but currently there are only 16 EV charging devises in Dacorum. However, I have seen no plans to increase this number in the New Local Plan.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS718

Person ID	1261251
Full Name	Lesley Ashden
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS747
Person ID	1261250
Full Name	Christina Thompson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS748
Person ID	1261101

Full Name	Hannah Smith
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	With the proposed 55% increase in population in Tring, roads originally designed for horse and cart, those of a small rural town, increasingly unmanageable congestion is inevitable. In pre-covid and more normal times, congestion along Brook Street in rush hour and with the schools traffic is already cumbersome. An increase in population of this scale is inconceivable for our roads. The proposed solution in the Plan for passenger transport, cycleways and pedestrian network, etc. will not help me or others avoid this congestion: it would obviously not be safe or practical to travel to neighbouring towns from Tring to work by foot or cycling, with roads of national speed limit involved; and in the light of the pandemic and mutations and our 'new normal,' people are unlikely to want to rely solely on passenger transport instead of their own cars - at times when households are not meant to be mixing and our lifestyles are adapting.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS759
Person ID	211245
Full Name	Ms Jody Conibear
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	This area is already massively congested and I cannot see much attempt to improve day to day car journeys, commuting or otherwise. The road traffic will increase through these plans, not decrease, which will make cycling and walking even less attractive than it is today (and I am a keen cyclist and a walker!). I cannot see any mention of supporting changes

to working patterns post-COVID (remote working etc) because the plans appear to revolve around needing to get from A->B (home to London/other cities or home to local office in the area). This plan does not reflect planning that I have seen in European countries such as France, Denmark, Sweden, Finland or Germany where the communities are self-sufficient and properly support other modes of transport. I urge Dacorum to look at better examples of sustainable ecosystems outside the UK.

Included files

Title Sustainable Transport and Connectivity

ID EGS808

Person ID 1261302

Full Name Robert Bailey

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Sustainable Transport and Connectivity comment Having read the prospectus for Bulbourne Cross, I think it is unlikely that the proposed development for homes and sports facilities will encourage more cycling in the area, given its geographical position well above the main nearby towns of Berkhamsted and Hemel Hempstead.

Included files

Title Sustainable Transport and Connectivity

ID EGS828

Person ID 1260562

Full Name DAVID WILDE

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Sustainable transport and connectivity. All homes and businesses should have close easy access to an EV charging point, ideally 1 per home.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS880
Person ID	1261462
Full Name	S LAU
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Re: Policy DM50 the strategy's defined the number of new homes will cause further strain to the already congested roads in the local area. whilst the current situation of congested road network and the need of shifting away from car-base transport is mentioned. There is also lack of policy relating to parking permit allowed per household. Policy should consider new development within close proximity to train stations should have limit of on-street carparking permit allowed per household. There is also a necessity to increase services of buses which will help encourage residents to shift away from car-based transport. Enhanced neighbourhood centres with essential services will also encourage people to walk to their neighbourhood centres rather than driving to out of centre retail.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS890
Person ID	1261484
Full Name	Simon Wraight

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Ref: 21.1 : "is well served by the west coast mainline railway service"</p> <p>This train line is already severely over crowded, commuters are frequently unable to board a train due to over crowding. Building thousands of extra houses in these towns will put further pressure on these lines and increase the misery to the people trying to earn a living. Our mandatory train journeys to London already see frequent and dangerous overcrowding and cancellations. Well served it is not.</p> <p>How will the West Coast Mainline be upgraded to cope with the obvious extra demand?</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS908
Person ID	926372
Full Name	Mr Michael Nidd
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The plan content in respect of Transport is thin, with little real evidence in the Transport Topic Paper for the Plan-shown creation of a 40mph road linking Leighton Buzzard Road to Redbourn Road and beyond. Nor is there any cost estimate, nor budgetary provision .
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS969
Person ID	1261569
Full Name	Karen Mellor
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	DM53 appears to be geared at new developments with not enough provision to connect/improve and Create adequate safe cycle routes throughout the county. Currently we can see no evidence of any joined up thinking within Dacorum Borough Council for both walking and cycling. Developers are allowed to get away with the bare minimum. I refer to the cycle path put in around the roundabout next to the old peoples home at the end of Red Lion Lane with no cycle path either side of it. It just stops. The cycle path along Belswains lane or is this actually a parking area? must win the award for most potholes in the county. It is truly atrocious and is a health hazard. There needs to be joined up thinking between Dacorum planning and County Highways planning. Also, compare Three Rivers grand union canal improvements versus the Dacorum end. There is no evidence that Dacorum Borough Council intend to ensure that its residents receive an alternative to the car as an effective and safe method of transport so that they can transition to cycling as a means of travel to and from work/shops etc. It is very clear that the Car is still King around here. I do not believe that this will change throughout the term of this Plan to take account of the seriousness of the Climate Emergency. There are a lot of words within this document but I view it as lipservice until I see clear evidence of cycle lanes displacing the car.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS986
Person ID	1260803
Full Name	Rollo Prendergast
Organisation Details	
Agent D	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	21.7 Urban Transport Plan and Sustainable Transport Strategies I refer to 'Berkhamsted and Tring Sustainable Transport Study'which informs the strategy as it applies to those towns.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1131
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	See above comments regarding a safe cycle link/footpath between Bovington & Hemel Station
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1209
Person ID	1261875
Full Name	Fiona Silver
Organisation Details	
Agent D	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The geography and existing road network of Berkhamsted means that there is already a significant traffic problem in the town which is why pollution levels in the centre can get above recommended levels. Building 24% more houses is not going to help this, particularly when they are being built some miles from the town centre and at the top of steep hills so that most people will not walk or cycle.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1245
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Policy DM50 'Transport and Movement' (Page 163)</p> <ul style="list-style-type: none"> • We welcome the proposals made and feel there is scope to be more specific on a site-by-site basis. For example, part of this major development should promote the usage of shared transport schemes: • Identify clear opportunities to use automatic electric public transportation (as proposed by developments such as Fawley Waterside). • Make all of the Grand Union Canal towpath a cycle way – with particular attention to the stretch between Tring Station bridge and Berkhamsted. The towpath could then become a great off-road cycle-way between towns. • Free public parking for electric vehicles everywhere in Dacorum. At least until electric cars start to significantly replace petrol and cause their own parking issues. • Follow Oxford's example with petrol vehicle ban zones in town centres (except for residents living in those zones) at an early date.

- Charging points for electric vehicles to be installed at key points around new developments. Are locations for these already allocated in the Local Plan?

Policy DM53 ‘Walking and Cycling’ (Page 167)

- The proposals for cycle paths around Tring do not, at present, link well with each other and this should be addressed as part of their integration with developments, in particular at Tr01, Tr02, Tr03. Proposals include ensuring that paths are well lit; however, for paths close to wildlife corridors, hedgerows etc the lighting should be low or ground level, to minimise adverse impacts on bird, insect and mammal populations.

Included files

Title Sustainable Transport and Connectivity

ID EGS1281

Person ID 1145427

Full Name Mr David Glenister

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment

As a settlement area, the County Council consider that Berkhamsted already has a sustainable transport network in place.”, despite going on to identify congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.”

Berkhamsted station itself is not well served by public transport and is situated at a distance (3-4km) from the Green Belt ‘Growth Areas’ promoted in the Plan.

There are few opportunities for new road capacity in the town” due to the topography and historic built nature of the town. The Herfordshire County Council ’s engineers comment that the traffic lights at the single main crossing operate at over capacity. Berkhamsted does not have a sustainable transport system in place and promoting growth on valley side and ridge-top Green Belt locations will only reduce those sustainability credentials further.

Included files

Title	Sustainable Transport and Connectivity
ID	EGS1305
Person ID	1261957
Full Name	Jeremy Johnson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	I agree with DM53 enhancing access via foot and cycle to the rural communities around Tring. But the roads themselves are also dangerous and badly maintained. You need to sort that out before adding hundreds of new houses.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS1318
Person ID	772477
Full Name	Mr. Roy Warren
Organisation Details	Planning Manager Sport England
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Policy DM53: Walking and Cycling

Policy DM53 is supported as it promotes safe and attractive walking and cycling by a range of measures and the reasoned justification in paragraph 21.30 recognises the health benefits of walking and cycling. It is requested that the Strategic Design Guide and the Detailed Design Guide SPDs are listed in the relevant evidence and supporting guidance as these guides promote walking and cycling through the application of design principles.

Included files

Title Sustainable Transport and Connectivity

ID EGS1338

Person ID 1145350

Full Name Mr Edward Murray

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment Not enough actions to reduce cars driving to town centres

Included files

Title Sustainable Transport and Connectivity

ID EGS1402

Person ID 1258930

Full Name Nicols Bowmaker

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No	
Sustainable Transport and Connectivity comment	The transport links from Tring do not support the scale of development. Already there is a huge pressure on the parking at the station, over crowding on trains and an inadequate bus service. The scale of development would only compound these issues
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1451
Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> 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
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1453
Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> 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
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1488
Person ID	1261408
Full Name	juanita mann
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>The plan fails to take into account the impact on the areas around these sites. The roads in and around Tring are wholly unsuitable for the level of growth proposed. Many of the villages will become seriously dangerous for pedestrians, cyclists and motorists alike: Aldbury, ivinghoe, Bulbourne etc. Most have narrow, twisty roads and few have full pavements.</p> <p>Tring station's car park is overflowing onto the side streets well before the end of the main rush hour, with many commuters driving in from outlying villages and other towns.</p> <p>As an alternative to motor transport, the bus service from Aldbury to Tring is so infrequent it discourages use and the service does not run late enough to support commuters.</p> <p>To say "The way we move around the Borough will need to change" is a massive understatement with no detail behind it.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1509

Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1562
Person ID	1261809
Full Name	Pam Ferguson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Berkhamsted already suffers from transport issues. The traffic in town is congested. The vast majority of new housing is on ridge top sites and steep valley sites which will lead to many more car journeys ,as acknowledged in the report .The town centre falls within the conservation area and improving the road network here is not possible .In Berkhamsted about 850 homes are being proposed along Shootersway all with access onto this minor road .Already many roads(Darrs lane, Durrants Lane, Cross Oak road are used as ratruns to avoid congestion along Shootersway and the High Street at peak times . A massive increase in housing would place unacceptable pressure on these roads.Similarly site BK01 (900 homes))would place unacceptable traffic demands on Swingate Lane.It is acknowledged in the plan that the topography of the town makes the use of cars unavoidable .The transport policy is not sustainable in Berkhamsted .

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1597
Person ID	1260507
Full Name	Michael Burbidge
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>There is little or no sustainable transport in Dacorum. Berkhamsted and Tring are served with poor and expensive bus services which are consequently lightly used. There is very little useable cycling infrastructure. Although there is a cycle path from Tring to the station this is of poor quality as it is shared with pedestrians, has an appalling surface (in spite of being resurfaced recently) and no lighting. It is poorly maintained with fallen leaves and overgrown bushes blocking the pedestrian side for most of the year. The road has huge puddles which mean that pedestrians and cyclists are constantly soaked by passing cars. I mention this as the report mentions with pride this infrastructure several times. If Tr03 is to be developed this will have to be rebuilt.</p> <p>It also says that "Dacorum will have in place a network of cycle lanes and secure bike parks, that have encouraged greater levels of cycling and walking". There is no requirement for Dacorum to wait for these new developments to make it a better place to cycle and walk but this has not been done. There are no networks of cycle lanes and secure parks so why should we believe that this will happen in the future. There is a substantial development in the west of Tring (Roman Park) but there are no improvements to the walking and cycling infrastructure to Ting along Aylesbury Road or Icknield Way. Another broken promise of a missed opportunity?</p> <p>Any cycling infrastructure will need to be built to encourage cycling and not for the benefit of the motorist. If lots of side roads are built along Station Road (from Tring to the Station) the cycle path will have to have priority over the traffic from the side roads to be useable. An example of poor provision like this is in Hatfield on the industrial estate build on the old airfield (Mosquito Way). Cyclists must stop at every junction making the journey long and tiresome (having to mount and dismount every few yards). This was an opportunity for Herts to showcase what it could build but it failed.</p> <p>The maintenance of the road surfaces and the drains in Dacorum is poor which again deters cycling and walking. Although it cannot be more the 1/2 a mile to the nearest primary school in Tring a large proportion of children travel to school by car. Because of the number of cars and no enforcement of parking regulations it has become dangerous for</p>

primary school children to cross the roads. If Dacorum were really interested in encouraging walking it would stop cars parking on pavements and on bends and provide clear sections of road to allow children to cross the road safely. The planning rules to only allow parking for 1.8 cars per property are clearly inadequate given that the new housing will not be close to existing facilities. Most people moving into the area will require 2 people in the household to work and their jobs will not be in Tring. This will lead to on street or more likely on pavement parking which will deter walking and cycling. I have attached a picture of the development at Tring Station (Clarks Spring) where given the proximity of the station you would have thought there would be fewer cars. This is what will happen in the new developments without proper parking provision, wider streets and pavements. Wide pavements which are separated from traffic by verges or cycle paths are needed.

To discourage car use developments must also lead somewhere so that cyclists and pedestrians do not have to travel a long way round to get to a nearby location. Developments tend to be cul de sacs with no access to the adjacent roads. An example of this is Grove Gardens/Hunters Close in Tring which has no access on to Brook Street. Please build proper roads that go somewhere!

Included files	20210217_140601.jpg
Title	Sustainable Transport and Connectivity
ID	EGS1639
Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1688
Person ID	1165136

Full Name	Mr & Mrs J.D Battye
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Transport.</p> <p>Int.SA D-40 admits that there are no SP policies on this subject yet it is the main driver of connectivity which in turn determines sustainability and therefore, theoretically if not in practice, site selection.</p> <p>Fine-sounding plans to ensure that the population abandon the use of their cars and take up cycling and walking look doomed to failure. Once more natural forces come into play; will the relatively old and ageing (the plan itself predicts a 60% increase over 20 years in the number of residents over 65 (p.19)) population of Berkhamsted (2.13) walk 30 mins. or cycle on congested roads (23.119) into the centre to face the inevitable hills on their return from shopping? (SA 6.6 admits as much) How can the promise of a strong emphasis on safety for pedestrians and cyclists (21.24,DM 50,52,53) be delivered in the town's constrained environments? (Fig.4-12 p.32 of the study flags the conflict between vulnerable road users and others,) As SA App.A-3 points out topography is key and the terms of DM53 will be extremely difficult to fulfil in Berkhamsted. Even the Transport study admits at 4.38 p.31 that "the topology presents challenges for walking and cycling, particularly to the east of Hemel Hempstead and around Berkhamsted."</p> <p>Puzzlingly the contributory transport study predicts that the plan will not adversely affect junction delays or congestion in Berkhamsted or Tring-most existing residents of the two towns would disagree totally with that finding even at present levels of population.</p> <p>Indeed if other parts of the vision were fulfilled, more and more residents would be able to afford the convenience of cars. Recent RAC and D fT surveys indicated an 11% rise in car ownership in Dacorum over 10 years. Cars are too convenient for those fortunate enough to own them to surrender. To achieve the vital and necessary reduction in emissions the plan needs to rely more on technology and less on unlikely changes in human behaviour. Even if public transport were improved dramatically in reliability, cost and frequency it would take a long time to change habits and such an improvement would need to be demonstrably in place to tempt anyone away from car use.(21.18) Incidentally, what are the "attractive opportunities to travel by bus"? (2.15)</p> <p>Moreover any shift in cycling and walking patterns would be heavily dependent on the pre-provision of safe and comfortable routes. The existing road system throughout Berkhamsted (23.120) and much of the rest of the Borough is inadequate, riddled with potholes and in a poor state of repair even for vehicular traffic. Much better road surfaces, especially on the fringes, better and freer drainage, more frequent gutter and carriageway maintenance and drain cleaning will be required.</p>

We have often been soaked by passing vehicles when walking along Cross Oak Road and Shootersway. Even with those improvements the existing road system in Berkhamsted and elsewhere is severely constrained by a lack of width, an absence of pavements and intrusive street parking throughout the central areas. How on earth would the existing road structure be modified safely to accommodate and protect vulnerable pedestrians and cyclists alike without causing severe congestion for other users, including the growing number of those delivering goods?

Included files

Title Sustainable Transport and Connectivity

ID EGS1703

Person ID 1262353

Full Name L HOUSDEN

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Sustainable Transport and Connectivity comment See attached representations - it is TTC's view that the overall strategy of directing so much growth to Tring is flawed. The supporting evidence in relation to draft policy DM50 is not available

Included files [Tring Town Council - Completed consultation Comments Form \(Final\).pdf](#)

Title Sustainable Transport and Connectivity

ID EGS1784

Person ID 1154047

Full Name Brendon Sparks

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
Sustainable Transport and Connectivity comment	With regard to Sustainability Transport Connectivity – Berkhamsted has a congestion problem. It does not have a sustainable transport system as the Council suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1800
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	DM50 I agree with the order of importance for the modes of transport. DM51 Brook Street Tring is a particular pinch point. DM52 I agree with the policies. DM53 I support safe, well lit walking and cycling routes. DM54 I would welcome an improved bus service for Tring and Tring station. DM55 The relaxation of parking standards has given rise to excessive on street parking in Tring. I support cl 2b design of spaces. DM56 cl 1c adequate provision of EV points in the future will be essential.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1818

Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>I believe that unfortunately Berkhamsted is not well sited for a sustainable transport solution. The only solution that will work around the town would be a bus service however I know from experience that people only use the bus if they do not have access to a car or if they aren't pressed for time. If you were going to town to buy more than a few items you would prefer to use the car then take the bus.</p> <p>Also the valley nature of the town makes routes complex and time consuming. As I know from living there for so long - you cannot "nip" anywhere in Berkhamsted as there are just very few routes across the valley and across the high street. Bus routes would not be direct and wouldnt be able to well serve all new homes,</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1923
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS1945
Person ID	1262298
Full Name	Simon Timlett
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Policy DM51 1.a. The northern distributor road</p> <p>As I understand it, this major road will connect junction 8 of the M1 with the B440 Leighton Buzzard Road north west of the current junction between Piccotts End Road. The B440 was re-designated from the A4146 to encourage more use of the A5-M1 Link, lift the traffic blight through Water End and Great Gaddesden and protect the narrow Water End bridge. A weight limit was also imposed on the bridge. The new road will actively be in contravention of those objectives. Since the re-designation and weight limit was imposed, the traffic volumes have been alleviated somewhat (although, latterly COVID restrictions may have played a part). HGVs still regularly defy the weight limit at the bridge.</p> <p>My other concern is around where the traffic is supposed to go when it reaches the B440 at Piccotts End. If the strategic objective is to create more connectivity with the A41, the traffic flows will go up Potten End Hill and through the village of Potten End (by the school and the dangerous junction of Water End Road/Church Road - a historic accident black spot). Or the traffic will proceed further along the B440 and turn left into Nettleden Road. That route has to cross the dangerous junction of Nettleden Road/The Common/Gravel Path.</p> <p>Both routes (Potten End Hill and Nettleden Road) end up having to negotiate the narrow, traffic clogged, residential streets of Berkhamsted to access the A41.</p> <p>If neither of these two routes are envisaged to be the route traffic will take, which is? Traffic looking to access A41 northbound will not do so by travelling south towards Hemel Hempstead (which would negate the reason for a northern distributor road). Is traffic therefore to proceed north along B440 across the narrow weight limit bridge at Water End (itself a traffic choke point and accident blackspot)?</p> <p>It seems to me the traffic flows have not been properly considered once they reach the B440. The plan ignores the facts that:</p>

the Leighton Buzzard Road is now not a trunk road, but a minor B road;
 there is a weight limit at the narrow bridge at Water End;
 Potten End Hill/Nettleden Road are unlit and without footpaths (since the spring of 2020 there has been a dramatic increase in pedestrian use of both roads by necessity on the carriageway - which should be encouraged as a positive thing);
 Berkhamsted will be blighted by increased traffic through its narrow residential streets.
 The new road junction planned at the B440 Leighton Buzzard Road north west of the current junction between Piccotts End Road will also be the main access point to the proposed housing development north and east of Piccotts End, which will also put extra traffic pressure onto the B440.
 The hierarchy laid out in Policy DM50 and taken from the Transport User Hierarchy in Hertfordshire County Council Local Transport Plan 4, seems to have been ignored and contravened in Policy DM51 1. a. It is entirely other motor vehicle user focussed (the bottom group in the hierarchy) and actively endangers vulnerable road users in Water End, Piccotts End, Potten End and Hemel Hempstead.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2028
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	21.3 Yes, the way we move around needs to change, not run to stay still. The proposed level of growth is flawed.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS2029
Person ID	1262601
Full Name	Anne Smith
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Not all proposed build sites will be able to achieve a successful local transport plan and these sites should not progress to the next stage if a safe transport plan cannot be devised. A case in point may be New Road Northchurch (BK07). Already accepted as having problems in terms of traffic safety and related pollution issues for some time there has been no easy solution. a link road was rejected on the grounds of expense. A potential increase of 120 cars from the Lockfield would exacerbate the problems further made more precedent by the school and sheletered housing present.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2063
Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2133
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Sustainable Transport and Connectivity Policies. As already stated several times in this document massive amounts of development bring more traffic. More traffic brings more pollution and makes the roads even busier and even less appealing to cyclists. Berkhamsted is unsuitably designed to allow for safe cycle lanes. The old roads are too narrow. Even on the main road into the town cycling is perilous as the road is fairly narrow. The town is built on two sides of a valley and it is impossible to either cycle or walk any distance carrying bags of shopping up huge steep hills. The suggested developments are mainly located at the top of massively steep hills. Berkhamsted already has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and ridge tops at a distance from facilities will make that situation worse.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2137
Person ID	1262818
Full Name	MRS SUE COLLYER
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No	

- * Yes
- * No

Sustainable Transport and Connectivity comment

1 Transport links

Your plan suggests that a new road will be necessary to take traffic from the M1 junction 8 Southwest taking traffic to Berkhamsted and Tring, to link up with the A 41. I have various objections to this scheme.

The need for it is being created by narrowing the width of the A414 from the magic roundabout to the M1 in order to create a 'rapid transit' system linking Watford, Hemel, Harlow and Broxbourne. I applaud such an idea, but you are putting the cart before the horse by creating another road through what is currently relatively unpolluted green land. - who knows if this scheme will ever get off the ground?

As I understand it, this new road will cut through new housing to end up on what your plan describes as the A4146. This road has now been designated as a B road – the B440. Once the traffic is deposited on the B440, what will happen to it? Going North the road meanders along the valley and in Water End has one way traffic controlled by lights at a bridge crossing which causes long tailbacks during busy times, and where accidents happen very frequently. The road is also liable to extensive flooding in wet weather. In order to access Berkhamsted and the A41, the traffic will have to negotiate narrow country roads, tiny villages with narrow roads, paths, crossroads, etc, will somewhere have to get under or over the Mainline rail route – and all the crossing

points are at uncontrolled one way access points – and that's before this same traffic has negotiated crossing the canal, the river, getting through Berkhamsted and up the steep hill out of the valley up towards the A41. Your plan tells us that no improvement to other road systems apart from those in Hemel Hempstead itself have been even considered by your planners.

There MUST be a better way - planning developments in one area cannot be justified if the impact of them is to create problems/issues/stress on the systems and resources elsewhere in the area. Surely the point of planning on this scale is to do it WHOLISTICALLY and try to make it a win/win situation for everyone. W

I live in Dacorum. I want it to thrive and survive and provide good facilities for all its residents, but I feel vital issues are not being addressed in this plan and would urge you to think again about the issues I have outlined above.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2177
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	For a start you, as a local Council, need to stop hiding behind national organisations. You must ensure that all these things have concrete and irreversable plans before embarkingh on any serious development work. Furthermore, I see no indication of how you are going to achieve the elements covered in section 21. You just keep on quoting well worn pat phrases. How are you going to ensure that the individual can travel to where they need/want to go, especially in the light of an ageing population. This is not friendly to people with disability either.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2205
Person ID	1262841
Full Name	Nada Ryan
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Berkhamsted already 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 only make what is already a bad situation far worse impacting negatively on all local residents.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2213
Person ID	1262765
Full Name	Paul Rees
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	For transport in Dacorum to be truly sustainable, the number of new homes envisaged by the plan needs to be halved - as the planned for high number of homes will hugely drive up traffic and lead to more pollution and carbon emissions . Given the climate and ecological crisis, Dacorum should be planning to build far fewer homes and to push more human journeys onto cycle paths and off roads.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2232
Person ID	1262860
Full Name	Susanne Rees
Organisation Details	
Agent D	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	If Dacorum really wishes to promote sustainability and biodiversity it must shift traffic away from roads forthwith, and encourage people instead to make their journeys by foot or by bike.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2273
Person ID	1262925
Full Name	Nandipha Jordan
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations. All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points. Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2298
Person ID	610662

Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>BRAG is concerned that the Plan only goes into any detail about Hemel Hempstead and later in the delivery Strategies paragraph 23.119 states <i>“As a settlement area, the County Council consider that Berkhamsted already has a sustainable transport network in place.”</i>, despite going on to <i>“identify congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.”</i></p> <p>BRAG does not agree that a sustainable transport network is in place. It is true that there is an excellent mainline railway but pre-pandemic it was running at capacity, while the station itself is not well served by public transport and is situated at a distance (3-4km) from the Green Belt ‘Growth Areas’ promoted in the Plan.</p> <p>Ignoring the lack of bus services in other directions, BRAG disagrees that the <i>“key interurban Aylesbury-Hemel-Watford bus route”</i> provides a <i>“good public transport service”</i> as described in the Topic Papers.</p> <p>The 500 route described in 23.119 is a commercial service operated by Arriva and only operates 3 buses per hour Monday-Friday, 2 buses per hour on Saturdays and a single hourly service during Sunday shopping hours. There is no evening service or early services on Saturdays, while it also suffers reliability issues due to its length.</p> <p>As 23.120 concedes <i>“There are few opportunities for new road capacity in the town”</i> due to the topography and historic built nature of the town. The county’s engineers comment that the traffic lights at the single main crossing operate at over capacity.</p> <p>Berkhamsted does not have a sustainable transport system in place and promoting growth on valley side and ridge-top Green Belt locations will only reduce those sustainability credentials further.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2347
Person ID	1261830
Full Name	alistair budd

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2423
Person ID	1227518
Full Name	Mr John LOWRIE
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Full transport surveys have not yet been completed. It seems to me that consideration has been concentrated on traffic traveling from Berkhamsted to M1 along the east / west corridor with nothing said about traffic going through the pinch point at Water End bridge on the north / south route. Will there be consideration to reducing traffic here.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2449
Person ID	1262981
Full Name	Chris Mabley

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The way people move around the borough needs to change and this may need to be by forcing vehicle traffic off rural lanes currently used as rat runs at times of congestion on the transport network. Semi permeable closure points and quiet way designation will prioritise cyclists and pedestrians. Developers will assess traffic in terms most favourable to them. Therefore highways planning should be the commissioning authority for the scope and measuring of impact of developer plans. In Bourne End we have had the nonsense of a developer not assessing traffic movements in Winkwell because they said they would not have vehicular access in Pouchen End Lane and there would not be many in Chaulden Lane (LA3) and another prepared to finance a footpath for public safety in Pix Farm Lane that stops at Winkwell where presumably public safety is already non existent.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2557
Person ID	1263183
Full Name	Claire Davies
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Again, what a missed opportunity here. You know that Berkhamsted, in particular, has a significant problem with traffic congestion? Building more houses on the outskirts of town, with no sustainable transport options to get into town, will just make this worse.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS2579
Person ID	1262037
Full Name	Jason Silver
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Berkhamsted already is a crowded town and traffic flow can be difficult. An significant increase in population and hence traffic is not overly catered for within the plan. Berkhamsted is located within a valley geography with a majority of the traffic funnelled into the valley floor difficult to see how a big increase in traffic can be catered for within the convines of the geography and current traffic flow model
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2610
Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent D	1253616
Agent Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity 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 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 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 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?

Included files

Title	Sustainable Transport and Connectivity
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ID	EGS2726
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Person ID	1263253
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Full Name	Todd Bowmaker
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Organisation Details

Agent D	
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Agent Name	
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Agent Organisation	
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Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	At present the public transport on offer in Tring is insufficient, with a limited bus service to and from the station. Significantly increasing the number of commuters as a result of the additional housing will only result in further challenges, and there appears to be no evidence to suggest an improvement, or increase, in the existing services.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2728
Person ID	1263254
Full Name	Teresa Finnigan
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	No you are relying to much on people living and working in hemel, reality is that this will not happen, links are stretched at the moment. There is a real need for a new community garden to be built somewhere further north, not on the edge of hemel.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2778
Person ID	1262722
Full Name	Colin McCready
Organisation Details	
Agent D	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2786
Person ID	1263104
Full Name	charlotte grange
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>I am glad that the Council are giving priority to walking and cycling routes (21.32), however, there are also other ways to reduce our reliance on private transport - our public transport system is in desperate need of a revamp. I would like to see a complete rehaul of our currently unreliable and infrequent bus service, (of which I have been a regular frustrated user in the past!) particularly in less accessible rural areas.</p> <p>I would also urge the Council to further consider the effects of the huge developments that are proposed around Hemel Hempstead, Berkhamsted and Tring. In Tring particularly, the proposed development appears to directly contradict your point in 21.25 - 'it is important that the development is respectful of the existing scale and character of the area.'. I understand that (as in Policy DM52) sustainable transport will be encouraged, however, as with past developments, it is simply not realistic to imagine that all of these developments will be largely reliant on cycling, walking, and clean public transport, and that traffic, and increased pollution, is an inevitable issue. As other commenters are pointing out, we are already experiencing increased traffic on our roads following the current new builds in Berkhamsted, and the A41 is often congested at rush hour. Adding to this is unfeasible - and could likely lead to road expansion, which is entirely unsustainable in the face of the climate crisis. Increasingly pervasive development will make Dacorum an unattractive place to live and work.</p>

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2846
Person ID	1263198
Full Name	Jillian Hipson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>21.2</p> <p>Berkhamsted and Northchurch have a congestion problem. They do not have a sustainable transport system, as bus services around the town are very infrequent and limited to daytimes only.</p> <p>Building on Lock Field at Northchurch will significantly worsen traffic problems because New Road Northchurch has a pinch point at the canal bridge, where the road narrows to a single track. At rush hour and school run times, there is congestion. People parking for the school run, or visiting the graveyard, or fishing, also add to the congestion by narrowing the road to one lane.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2882
Person ID	1263425
Full Name	Andrew Farrow
Organisation Details	Nettleden with Potten End Parish Council
Agent D	1253616
Agent Name	Andrew Farrow
Agent Organisation	

Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>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;”</p> <p>and (21.16) quotes the NPPF which states that “sustainable transport options will vary between urban and rural areas.”</p> <p>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”.</p> <p>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”</p> <p>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.</p> <p>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.</p> <p>“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).</p> <p>“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).</p> <p>“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)”.</p> <p>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.</p>

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.

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?

Included files	Possible traffic flow map.png (4)
Title	Sustainable Transport and Connectivity
ID	EGS2922
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS2997
Person ID	1263478
Full Name	ELIZABETH RAILTON
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Sustainable Transport and Connections: some of the transport links certainly make Dacorum very accessible, particularly in the pre-Covid environment. However, congestion in some of the local road networks remains very significant even in current pandemic circumstances. A number of the proposed key developments will make these problems worse without any easy solutions. The suggestion that alternatives to the car might be feasible are very glib in terms of some of the proposed ridge developments where buses are unlikely to be convenient and there is no viable means of widening narrow roads and tracks.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3048
Person ID	1261425

Full Name	Camilla Pascucci
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>1 The DLP Sustainable Transport Study does not show current volumes of traffic flow, and then that projected at the end of the Local Plan, arising from the proposed new homes/population growth. Therefore, the Draft Local Plan does not define the social impact of the proposed growth in the town and the reduction in the quality of life to the existing citizens.</p> <p>On further inspection its facts/figures/evaluations do not use consistent base markers for data/statistics and does not clearly state the source/date/nature of the information. An example is Berkhamsted, the DLP has statements where the population data sometimes is Berkhamsted only, sometimes includes Northchurch, sometimes 2011 census and sometimes 2015/2017/2019. There is no clear base figure that is being worked to, so it is not easy to understand the potential impact.</p> <p>The Dacorum DLP states that it seeks to reduce the number of car journeys and increase the use of sustainable transport, but it does not make it clear how this might be achieved other than by attrition and road congestion.</p> <p>We live in Northchurch in Berkhamsted, where the current provision of the Rail Service is already operating near to maximum capacity. There is no expansion of bus transport or new train services proposed in this DLP. How can car commuting be reduced if there are no transport alternatives available? How is Dacorum going to encourage commuters to give up their cars? How does Dacorum BC expect to achieve reduced car usage? There are no details.</p> <p>I also see there are no significant proposals for improvements to road or traffic flow and no proposals have been made to improve walking/cycling/public transport routes and also, there is no significant improvements to public open spaces.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3135
Person ID	488516
Full Name	mr hugh siegle
Organisation Details	
Agent D	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>The various site specific requirements in Section 24 lack reality. Most junctions with the High Street/London Road in Berkhamsted are incapable of physical improvement due to the existing buildings. Side roads referenced are narrow and at capacity especially where residents have no alternative but to park on road. It is not clear what "sustainable transport infrastrucure" is or how it would be applied in Berkhamsted given its topography and narrow road network.</p> <p>The consultants report is complicated and not easy to understand and gives the opposite effect to that intended in that it demonstrates how difficult it will be to accomodate the proposed growth in all forms of movement....vehicular, cycle or pedestrian, resulting from trying to force 2200 new homes onto Berkhamsted. Many of the Town's purely residential roads are already suffering from being used as attempted short cuts or rat runs; this can only spread to other roads if developments such as South Berkhamsted, Bk01, is allowed to proceed.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3137
Person ID	1263457
Full Name	Matthew Deane
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>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 to ensure that development encourages these options through good design and ensuring their convenience.</p> <p>This says it all - there are ambitions but no commitments, timescales or clarity about what will actually be delivered. Current experience of living in the borough tells us that these are empty policies . The lack of tangible progress leads to a gradual erosion of quality of life for all , rather than enhancing it.</p>

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3234
Person ID	1263566
Full Name	Frances Read
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3264
Person ID	1262291
Full Name	Paula Farnham
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Passenger Transport the plan indicates a commitment to improving passenger transport, which is rightly regarded as important for those living on the edge of the communities, but implies the improvements are linked to the new developments. this needs to be

expanded to all settlements - without addressing the issue across the Borough and existing development, this has no impact to the wider issues of transport rightly acknowledged

Included files

Title Sustainable Transport and Connectivity

ID EGS3281

Person ID 1262255

Full Name AJ W

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment 21.4 Berkhamsted does not have a sustainable transport system, all it has an overcrowded mainline train line to London and a couple of buses every hour. The sites of the developments on valley side locations mean that inevitably people will be using cars to travel into to town and indeed elsewhere exacerbating the air pollution problem that by DBC's own admission, currently plagues certain areas of the High Street.

Included files

Title Sustainable Transport and Connectivity

ID EGS3385

Person ID 1262737

Full Name Andrew Cassels

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No	
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3432
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	No Comment
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3459
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment 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.

The plan concedes that there are few opportunities for new road capacity in the town but also says that Berkhamsted has a sustainable transport network in place. While there is an excellent mainline train service, the station is about 1.5 miles from the 'Growth Area'. Parking is already a problem despite the new multi-storey car park and the only bus route is through the town centre and operates between Watford and Aylesbury. From Berkhamsted to Watford (10 miles) takes over an hour by bus, . By car, the same journey takes approximately 30 min outside rush hour and by train about 15 min.

Included files

Title Sustainable Transport and Connectivity

ID EGS3513

Person ID 1263810

Full Name David Tolfree

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Sustainable Transport and Connectivity comment As much as this section says about reducing car use,. this realistically wouldnt happen if more developments are built on the outskirts of market towns as its the main median for residents to trave to and from work outside, especially in Tring.

Included files

Title Sustainable Transport and Connectivity

ID EGS3540

Person ID 1261821

Full Name Chris Cole

Organisation Details

Agent D

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	This is another "prayer on paper", full of good intentions. We should all pollute less, travel less, use ore sustainable forms of transport etc etc, but there is no infrastructure plan that delivers it. Get the transport infrastructure plans and commitments in place and <i>then</i> you can start to increase the housing and population, not the other way around.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3560
Person ID	1263821
Full Name	Anne Isherwood
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	There is reference to a road linking Junction 8 of the M1 to the B440 somewhere between Hilliers Garden Centre and Water End. this is potentially a rat run from the M1 to Berkhamsted via Potten End and to the north through Nettleden, Little Gaddesden, Ringshall and Dagnall avoiding the narrow bridge at Water End. this could generate unsustainable traffic increases. It must be managed to ensure it is simply an access and not a link road.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3614
Person ID	1263865
Full Name	Robin McMorran

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	More duplicitous rubbish. Maintaining and developing the Grand Union Canal? The towpath has been disintegrating for years! Do we need all this overindulgent hogwash to tell us you're going to fix it?
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3652
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3733
Person ID	1263921
Full Name	sarah diehl

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3735
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	How do you expect to keep up with the already over used transport network? The A41 and Trains are already bad enough at peak times..
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3797
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3865
Person ID	1263989
Full Name	Lauren Ashton
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3877
Person ID	1263982
Full Name	Lisa York
Organisation Details	

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Local transport cannot cope now, traffic in Berkhamsted is already bad
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3945
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Berkhamsted has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3960
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent D	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Berkhamsted has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.</p> <p>Berkhamsted is a beautiful town, ideal commuting distance from London. But it has the challenge of its location. It is set in a relatively steep valley which rises over 60m from the bottom of the valley to the top. The main road up the valley, forms the high street through the town. The Railway station is near the centre of the town. There are not many alternative roads to the high street, to get from one end of the town to the other. There are few radial roads. So for most journeys from the periphery of the town, to any other part of town it is necessary to go through the centre. The result is the main junction in the town is regularly grid locked in rush hour.</p> <p>The centre of the town was built in the 19th century with narrow streets and no off-street parking. In the 20th Century the town continued to expand until the periphery is no longer in walking distance of the centre.</p> <p>There are no natural routes for new roads to relieve this. The existing roads are not capable of handling the existing traffic.</p> <p>There are proposals to build 2,200 new houses on the edge of town. Most of these will be large family houses which will not be affordable on local wages.</p> <p>No explanation has been provided as to how the town's road and transport system will be able to cope with the resultant journeys that will be generated which will result in a further 13,200 car journeys a day according to 'Trics' (Trip Rate Information Computer System).</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS3982
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4010
Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4031
Person ID	1207786
Full Name	Anne Foster
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes

* No

Sustainable Transport and Connectivity comment

Policy DM50 - Transport and Movement -

This is particularly significant in Berkhamsted given the current congestion issues and limited opportunities to address the problems. Many detailed comments have been made in answer to previous questions.

- 1 The Council seeks to deliver Local Transport Plan 4 by facilitating a transport strategy in the following order of importance:
 - 1 *Opportunities to reduce travel demand and the need to travel.* - Fail in Berkhamsted, by proposing development in unsustainable locations
 - 2 *Vulnerable road users needs (such as pedestrians and cyclists).*- no safe cycleways are proposed the from new developments to the station and town facilities; there are no easy pedestrian routes, and many proposed sites are beyond walking distance even without considering the town's topography
 - 1 *Passenger transport user needs (such as bus, train and taxis).* - Berkhamsted has no intra town bus service, a day time only inter town bus service and a station inaccessible from the new developments for most, except by car
 - 2 Powered two wheeler (mopeds and motorbikes) user needs.
 - 3 *Other motor vehicle user needs.*- Definitely not addressed given existing levels of congestion and the proposals to add to it with massive amounts of development.
- 2 This strategy will be supported by adopting the following principles that will incentivise other transport modes and reduce dependency on the private car:
 - 1 *Locate development in areas that provide good levels of access to sustainable modes of transport and can make provision for its improvement.* - Not in Berkhamsted
 - 2 *Promote genuine transport choice through the provision of direct, safe and convenient walking and cycling networks and make improvements to passenger transport and its supporting infrastructure that would incentivise non car based travel.* Not in Berkhamsted
 - 3 *Improve access to key services and facilities by all modes of transport and provide better integration between these modes.* Not in Berkhamsted
 - 4 *Where possible as part of major development promote the usage of shared transport schemes.* How ?

Included files

Title Sustainable Transport and Connectivity

ID EGS4072

Person ID	1012318
Full Name	Mrs Jane Hennell
Organisation Details	Area Planner Canal and River Trust
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Fully support increased usage of sustainable transport options. The Canal & River Trust promote the use of our towpaths as active travel routes and support Policy DM53, subject to recognition that increased use of existing designated or non designated routes may need mitigation and improvement.</p> <p>DM56 The local plan should consider how support for boaters in the area (liveaboard and leisure) to transition to low/no carbon requirements as set out in the governments legal zero emissions targets by 2050 (Clean Maritime Plan). For example, could electric charging points for boats be installed (possibly at the same time as car charging points are installed if sites are adjacent to the waterway (e.g. Waitrose car park Berkhamsted, Berkhamsted station car park, Herts County Council office car park at Apsley) may all offer opportunities for this?</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4095
Person ID	1263468
Full Name	Bruce Day
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Sustainable Transport and Connectivity comment	The section on transport interventions under policy DM51 states that "Land identified through the Sustainable Transport Strategies as important transport corridors will be protected for transport interventions and will be retained as its existing designation until such a time where the land is to come forward for development". The South-North movements to Berkhamsted town centre and the East-West movements through Berkhamsted are such areas of intervention. Observations of current problems, the topography in the areas and the housing proposals of make fanciful at best the idea of such interventions bringing successful connectivity in Berkhamsted. Even a strategic plan needs to be supported by more effective "on the ground" information and statistics.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4125
Person ID	1264070
Full Name	Michelle Carnegie
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4153
Person ID	1262892
Full Name	Jean Farrer
Organisation Details	
Agent D	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>I fully support the submission of the One Voice Alliance for this section. The Bypass was built around Berkhamsted to relieve traffic congestion. With this increase in households, we will suffer similar congestion along the A4251 and through the High Street. With housing up to the A41, where can any expansion to the road network go?</p> <p>The idea that we are going to be transformed into cyclists to shop in the town is unrealistic. Steep hills and distance will prevent this. I can see that local subsidised buses are underused now - I don't see the residents of Berkhamsted having the change of behaviour you hope for.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4183
Person ID	1145844
Full Name	Dr and Mrs Melvyn Else
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4232
Person ID	1264306

Full Name	Peter Williams
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>In relation to cross border transport linkages it is noted that Policy DM50 states how the Council will seek to deliver Local Transport Plan (LTP) 4 and support it with principles that will incentivise sustainable transport. However, there does not appear to be anything to suggest how measures to encourage the change of travel behaviour within the Borough and the wider Hertfordshire County area, such as Mass Rapid Transit, may link into surrounding areas outside the Borough such as Buckinghamshire. It is suggested therefore that a specific recognition of the positive benefits of such links into surrounding areas is included in the plan.</p> <p>It is also noted that Policy DM54 puts an emphasis on encouraging greater public transport use for both bus and rail travel. This will have the potential to offer improved sustainable transport links to areas outside the Borough and the County, and in turn would have the potential to reduce the traffic impact on areas within Buckinghamshire. It is therefore further suggested that a specific recognition of the positive benefits of such links into surrounding areas is included in the plan.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4233
Person ID	1264269
Full Name	Paul de Hoest
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment	<p>Numerous local groups have commented on this consultation including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party to name a few. I agree with the stance taken by all of these groups. The fact that all these (and there will be others) are providing the same substantive message from the local population to you should demonstrate that these proposals do not have the support of the people. I do not propose to add to your reading burden by rehashing all of their points but I do make the following observations.</p> <p>There is insufficient attention given to sustainable transport modes - public transport routes, pedestrian routes and cycling routes. Nearly all of the large proposed developments lie on the fringes of their towns. The presumption is that most of the residents will drive private vehicles into town. This is especially true in a town like Berkhamsted which is hilly on both sides. Infrastructure to support the use of EB (Electric Bikes) is essential. (Cycle routes and secure parking arrangements)</p> <p>This is simply not sustainable.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4340
Person ID	1264325
Full Name	Olivia Halper
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>21.3 Transport also has a huge bearing on health and wellbeing – encouraging active lifestyles. This should be included.</p> <p>DM51 1.a) NOT a ‘distributor road’ but a ‘Northern Link Route’</p> <p>DM51 1. What are ‘movements’? Better to say ‘travel’?</p> <p>DM51. What about land for smaller-scale transport infrastructure like MMTIs and cycle schemes?</p>

DM52: Should include requirement that proposals provide a coordinated scheme that does not prejudice the future provision of transport infrastructure and links on and through adjoining sites – particularly relevant for phased development on the edge of built up areas so that movement networks are connected.

DM52 1: Seems odd to have the principal way in which development proposals will be expected to minimise car travel to be provision of broadband... Suggest re-order or remove broadband provision point. We don't want active and sustainable travel infrastructure provision to be watered down with excuse that broadband has been provided...

DM52 1.c: requires developers to 'encourage the use of sustainable transport'. This should be expanded to include 'enable sustainable transport, in particular walking and cycling', by delivering or making contributions to the delivery of sustainable active travel infrastructure and public transport infrastructure or service provision on and off-site.

DM52 2: As with DM52 1, it's odd to refer to car clubs first. Fundamentally, the layout of the scheme and design of fixed elements need to be right. Car clubs can be retrofitted, these can't – refer to layout and street design first.

DM52 2a: again the wording should be made stronger - enable rather than just encourage reduced car ownership. Support the reference to achieving this through overall site layout however explicit reference should also be made to off-site infrastructure works/contribution in order to secure the kinds of infrastructure that is needed to deliver modal shift and sustainable movement.

DM52 2f: the wording here should be substantially strengthened in order to secure significant modal shift particularly for HGC growth areas. Suggested wording: "Proposals for development in Growth Areas and other major development must demonstrate that they have been designed to enable, encourage and prioritise sustainable modes of transport. This may include the provision of on-site or off-site infrastructure for walking, cycling and other sustainable modes, as well as high quality design and layout to reduce the dependence on car travel. Where development proposals are coming forward as part of a phased plan, implementation of sustainable travel infrastructure and other measures should be delivered in the early phases in order to enable and influence sustainable travel patterns and behaviours to become established from the outset of occupation."

DM52 or DM54: Should include general requirement that transport provision should be well designed and of a high quality, sustainable in design construction and layout and provide a choice of different transport modes. Transport provision is a key element of creating successful places. -Make specific reference to provided accessibility for all potential

users, including those with reduced mobility, recognising the role of cycling, assisted cycles, tricycles etc., scooting and mobility scooters offers for those that are less mobile.

DM53: Need to be clear that opportunities for integrating active travel routes with green infrastructure are to be promoted.

DM54: Part 1 of the policy should apply to all sustainable transport (bus, cycle, walking etc.) not just passenger transport.

GAP: Strengthening accessibility and movement along blue corridors including Grand Union Canal, River Gade and Bulbourne towpaths. All new strategic scale development to respond through design and secure delivery with planning obligations. These waterways are not currently considered/referred to as part of a strategic network of routes in Hemel. Rather, the focus is on quality/access improvements. Need to emphasise the network and relationship of these routes to modal shift.

Digital DM57: expand to include other digital technologies where they contribute to the spatial strategy aims?

Included files

Title Sustainable Transport and Connectivity

ID EGS4384

Person ID 1261609

Full Name DEBORAH CROOKS

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No No
 * Yes
 * No

Sustainable Transport and Connectivity comment

Included files

Title Sustainable Transport and Connectivity

ID EGS4404

Person ID 1259206

Full Name	Greg Smith
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>21.29 Walking & Cycling</p> <p>The council states that walking & cycling 'feature high' in its Transport User Hierachy however this has not proven true with the developments the council has allowed to be built in Berkhamsted. Bearroc phases 1&2 are full of massive, polluting SUV's where residents are not walking or cycling to town as the council states.</p> <p>The council is also proposing to put several thousands more people in Growth Area Bk01: Land South of Berkhamsted including hundreds of older people. This site is miles away from the centre of town & up a 60m high, steep hill. It is not realistic or remotely feasible to claim elderly people or even normal, healthy adults will be walking or cycling up that hill. Thus they will purchase more massive, polluting SUV's and make the congestion & pollution in our town even worse.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4464
Person ID	1160525
Full Name	Mr John Hislam
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Sustainable Transport and Connectivity comment	<p>All future planning developments should include consideration of allowing better pedestrian access to / from the location to other strategic locations. This should assist people's choices w.r.t use of cars in favour of walking. In addition, accessibility ramps should be more widespread to assist those with impaired mobility.</p> <p>All future planning developments should require adequate arrangements for off-street parking. Where necessary parking areas must be included within the development's curtailments.</p>
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Included files	
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Title	Sustainable Transport and Connectivity
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ID	EGS4466
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Person ID	1264316
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Full Name	Melanie Turner
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Organisation Details	
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Agent D	
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Agent Name	
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Agent Organisation	
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Yes / No * Yes * No	Yes
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Sustainable Transport and Connectivity comment	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.
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Included files	
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Title	Sustainable Transport and Connectivity
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ID	EGS4494
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Person ID	1262731
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Full Name	Julie Battersby
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Organisation Details	
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Agent D	
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Agent Name	
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Agent Organisation	
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Yes / No	Yes
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- * Yes
- * No

Sustainable Transport and Connectivity comment

DM50(1) In regard for public safety, it would be assuring if *Access for Emergency Services and Service Vehicles* were separated out from “Other vehicles” and included in the hierarchy.

DM50(2b) The canal walkways have been resurfaced in some places but not others. I am put off walking to the station or town centre from where I live along the canal in wet weather because of the mud and puddles that accumulate in those areas where the path has not been resurfaced. Recommend therefore the following change “Promote genuine transport choice through the provision of direct, safe and convenient walking and cycling networks including *resurfacing canal walkways*, making improvements to passenger transport,....etc”.

DM51- Agreed

DM52 – The impact of incentives to create social change can also be utilised to minimise car travel, including designated parking bays for car sharers and peak time shuttle services.

DM53 (1) - For several years I lived in Milton Keynes and cycled everywhere. This was possible because of their extensive interconnected redway cycle path system which keeps cyclists away from main roads. I recommend statement 1 is amended as follows: ‘Wherever possible, priority should be given to walking and *interconnected* cycle routes,’

DM54 (3)– In Aylesbury residents are encouraged to use buses because many have an electronic tracking system that shows when the next bus is due. This digital technology would benefit Dacorum users if extended where possible to key bus stops. Therefore, I recommend the following change: *”Bus stops must have good pedestrian access, be open to public supervision, and where possible be sheltered *and have real-time electronic notification of arrival systems.*”

21.39. I do not agree in principle with the intention to restrict parking to the extent described in commercial areas. My personal experience of working in an environment where there is inadequate parking is that it causes immense mental stress, particularly as a worker required to be able to travel by car at short notice as a condition of my employment. It would also apply where a worker travels in from an area not served by train lines. Buses take far too long and cease running too early. It is a difficult and prohibitively long process taking several hours to get young children to a childminder, then to take a slightly older one to school and then to get a bus to work (even to a neighbouring town). I tried to make do without my car and quickly gave up. Therefore, depending on the nature of the businesses occupying employment areas there should be some flexibility planned in the design to enable an increase in amount of parking spaces available should the type of business occupying the area or the nature of the workforce (eg mainly parents with young children) require it. See DM56 (3)

DM55– Agreed

DM56 (3) – Recommend that the following is added: “*Developers should take into account planning for additional provision in high density employment areas where a high proportion of employees have an essential requirement to travel out of the vicinity at short notice or have childcare requirements that are not satisfied on site.*”

DM57- Agreed

DM58 - Agreed

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4510
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	How does building homes on ridge top sites, a distance away from employment opportunities help to reduce congestion and improve air quality?
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4533
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity 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 Sustainable Transport and Connectivity

ID EGS4559

Person ID 1264424

Full Name Basundhara KC

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment Dear Sir/Madam,

Population and houses are increasing near Three cherry tree lane and Maylands Avenue.

Therefore a train station near by will greatly help in the future. At the moment train station is too far therefore people are unable to travel to London or nearby city for better paid jobs. I myself work in Watford and drive everyday to work.

I would prefer to use public transport whenever possible but the location I live in public transport is almost impossible.

Further development of houses in this area will certainly increase significant traffic and pollution in Hemel Hempstead.

Before building more houses and welcoming new residents , Transport facilities should be assessed.

Hope my opinion will be taken into consideration.

Yours sincerely

Basundhara KC

Included files

Title Sustainable Transport and Connectivity

ID EGS4585

Person ID 1145918

Full Name Mr Richard Tregoning

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No No

* Yes

* No

Sustainable Transport and Connectivity comment

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4606
Person ID	490893
Full Name	Mrs christine kavanagh
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>There needs to be a safe network of cycle paths to encourage people to use their bicycles for commuting and leisure purposes. St. Albans council has created a number of safe cycle routes but there is only the Nicky line in Hemel Hempstead, which has no dedicated, safe cycle routes to access this path.</p> <p>There is plenty of land available on the side of the A4147 from Leverstock Green to St. Albans to accommodate a dedicated cycle lane for cyclists wishing to access the Gorhambury estate and the country lanes around the Hollybush pub. There should also be dedicate cycle paths around Hemel town centre. We all want to use our cars less but many people feel unsafe cycling on main roads as these are too narrow for cyclists to share the road with cars and there are too many narrow sections with Keep left signs. These make cycling even more dangerous.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4701
Person ID	1264495
Full Name	Ian Fyfe
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>Transport.</p> <p>Having stated at the outset that provision of increased passenger transport and sustainable transport initiatives is part of the plan, it is stated in the detail that "Berkhamsted already has a sustainable transport network in place" and that "Berkhamsted, given its size, level of facilities and transport links, should be an important focus for meeting the Borough's development needs."</p> <p>Comment.</p> <p>Berkhamsted's facilities are already stretched to breaking point as a result of the growth it has experienced in the last 4 decades. If transport links are good, why do so many commuters both into and out of the town not use them? It is my understanding that over 80% of commutes out of Berkhamsted are made by car and over 60% of commutes into the town are also by car.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4715
Person ID	1264462
Full Name	Penny Clifton
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>I agree with the need to improve the cycle network ensuring that roads are safe for cyclists; however, much of the area is hilly and unsuitable for anyone but the most experienced cyclist.</p> <p>The plan mentions the need to reduce congestion.</p> <p>Berkhamsted has a particular problem with congestion and does not have a sustainable transport system, with poor bus services. The town's natural geography and location of the main retail and other services in the valley bottom, means that new development along the ridge tops near the A41 will exacerbate existing traffic problems.</p>

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4723
Person ID	1264485
Full Name	Charlotte Brown
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4732
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The areas proposed for development in Berkhamsted and Northchurch, particularly BK05; BK06; BK07 and BK08 are off narrow country roads. It will not be possible to provide cycle paths or safe pavements to encourage non car travel.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS4748
Person ID	1264510
Full Name	Martin Evening
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>The DLP Sustainable Transport Study does not show current volumes of traffic flow, and then that projected at the end of the Local Plan, arising from the proposed new homes/population growth. Therefore, the Draft Local Plan does not define the social impact of the proposed growth in the town and the reduction in the quality of life to the existing citizens.</p> <p>On further inspection its facts/figures/evaluations do not use consistent base markers for data/statistics and does not clearly state the source/date/nature of the information. An example is Berkhamsted, the DLP has statements where the population data sometimes is Berkhamsted only, sometimes includes Northchurch, sometimes 2011 census and sometimes 2015/2017/2019. There is no clear base figure that is being worked to, so it is not easy to understand the potential impact.</p> <p>The Dacorum DLP states that it seeks to reduce the number of car journeys and increase the use of sustainable transport, but it does not make it clear how this might be achieved other than by attrition and road congestion.</p> <p>We live in Northchurch in Berkhamsted, where the current provision of the Rail Service is already operating near to maximum capacity. There is no expansion of bus transport or new train services proposed in this DLP. How can car commuting be reduced if there are no transport alternatives available? How is Dacorum going to encourage commuters to give up their cars? How does Dacorum BC expect to achieve reduced car usage? There are no details.</p> <p>I also see there are no significant proposals for improvements to road or traffic flow and no proposals have been made to improve walking/cycling/public transport routes and also, there is no significant improvements to public open spaces.</p>
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS4825
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS4883
Person ID	1264524
Full Name	Karen Kang
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	

Title	Sustainable Transport and Connectivity
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ID	EGS4983
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent D	1264539
Agent Name	Bethan Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>This section aspires to support open spaces which contradicts the proportion of green belt disappearing under this housing draft plan. the numbers need to be halved based on latest ONS 2018 population data.</p> <p>The primary and secondary healthcare provision in Dacorum is already significantly overstretched. The additional primary provision in this plan MUST be implemented. With regard to secondary provision, I believe that we need a whole new hospital as outlined by the Herts Valley Hospital proposals (Watford hospital is not fit for purpose due to lack of local development potential and existing traffic gridlock and Hemel hospital no longer has any of the essential ward specialities to be more than a glorified primary care unit). A new hospital would mean Hemel hospital can then be closed and the site completely redeveloped (rather than this plan's proposed reduction of the footprint)</p> <p>Education provision is also already oversubscribed thus the proposed development of new schools MUST be implemented, not just the 'easy' housing development.</p> <p>I support maintenance of the sports pitches, parks and school playing fields. These should not be sold off. The pandemic has shown how vital people regard such areas, together with the green belt, to maintain their mental and physical health.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5017
Person ID	1264554
Full Name	Mr Malcolm Allen
Organisation Details	Chairman South West Herts Conservative Association

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>Objections. Transport.</p> <ol style="list-style-type: none"> 1 Berkhamsted is a linear/valley market town with narrow streets and with a station in the centre of the town. Parking is a major headache now and this development is likely to generate extra car journeys a day per car. Assuming each new house has two cars, the average for Berkhamsted, we can expect around 15000 more journeys in and out. 2 The Plan constantly recognises that transport is problematical in Berkhamsted because of its topography. Figure 3.12 etc (Ref C) clearly indicates that walking and cycling from the Berkhamsted ridge sites is unfeasible and people will drive. The roads they will use are narrow and the two/three car families mean street parking is the norm. The 630 houses referred to in paragraph 10 above, including Hanbury's which is already allocated, and the 260 houses in Blks 06 and 07 would also use Shooterway, Kings Road and Crossoak Road to access the town. These roads have narrow or no pavements. Shootersway is used by children and parents walking to and from school. There will also be a huge impact by Heavy Goods Vehicles supporting the building projects. Kings Road is just about wide enough for two-way but not for trucks in some places. There is a school at the lower end. Crossoak Road has a single lane section. Then, of course, there is air pollution to consider especially in the town centre valley. 3 There are no plans to improve access on to the A41 so at rush hour we can expect huge congestion around the entry and exit junction and the feeder routes on to it including from Chesham which is also scheduled for a large development. Such congestion already occurs regularly now. 4 The Transport Vision again finds ways to underpin an accepted '<i>sound local plan</i>'. Para 3.10 (ref B), the '<i>Adopted Hierarchy</i>' is a wish list which puts car and truck usage at the lower end of the priorities when everything in the study points to increased car usage and journeys. The statement that '<i>sustainable transport is a real option as public transport is more reliable, rapid, flexible, convenient and under used</i>' is not supported by evidence. 5 Once again it is shown that cycling is not an option because of the topography. Para 4.16 (ref B) clearly indicates that that the vast majority of the 3,964 journeys quoted will be by vehicle via the A41 with its single entrance from Berkhamsted. 6 Para 4.21 (ref B) states that rail connections from St Albans and Watford are better than in Berkhamsted which is in direct contrast to the statement in 2.3 which says '<i>we are well placed to shift longer strategic journeys onto rail.</i>' There is no definition of a '<i>strategic journey</i>'? The key information is that most commutes are by car, 83% outbound and 61% inbound and table 4.9 shows that car is the dominant means of commuting and that cycling commuting is low. That means the A41 and its single access point.

7 The introduction to the Transport Study states that its aim is to '*develop the transport evidence base for the local plan.*' We have concluded that this encourages the selection only of evidence to support decisions already made. The Plan acknowledges that the topography of Berkhamsted makes cycling and walking difficult yet goes on to produce ideas about cycle lanes, bike parks and restricted traffic in the High Street. Few people, especially older people and shoppers, will walk up and down the steep hills from their homes to the town centre particularly as their routes which, even now, are congested and polluted rat runs.

There is no evidence that the developers of each site will pay anything towards improving roads and paths. One only has to look at the minimum work done on Shootersway by the Bearroc developers.

Included files

Title Sustainable Transport and Connectivity

ID EGS5037

Person ID 1264557

Full Name Natalie Crane

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Sustainable Transport and Connectivity comment 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.

Included files

Title Sustainable Transport and Connectivity

ID EGS5065

Person ID 1264258

Full Name Fintan FitzPatrick

Organisation Details

Agent D

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations. All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points. Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5120
Person ID	1250013
Full Name	Mrs Nikki Bugden
Organisation Details	Clerk Nash Mills Parish Council
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	SUSTAINABLE TRANSPORT AND CONNECTIVITY <i>Parking and car ownership</i> We fully support the vision to encourage and promote sustainable travel for local everyday journeys, where work locations and local centres for retail and leisure allow. However, we have concerns about the vision for reduced car ownership and the related parking allocations. We are located with convenient access to the M25, M1 and A41 and, although strategies to encourage sustainable travel around town may well be successful, the proximity to major road networks give residents the choice to use a car for journeys outside of the local area or to feel secure if travelling during hours of darkness. Visitors to residents of Dacorum

may also travel via the road networks. As stated in the newly adopted parking standards, car ownership figures from the 2001 – 2011 census showed little change and we are yet to know what the 2021 census will show. It is also acknowledged in the plan (and within the adopted parking standards) that the local topology can prove a challenge for some people.

We agree that a decrease in car use for everyday journeys should be encouraged, however applying flexibility to adopted parking standards to provide insufficient parking at residential properties will continue to result in on-street parking stress and obstructive / dangerous parking.

Local developments in Nash Mills are situated within easy reach of Apsley Railway Station and many residents use this facility. However, the majority of residents will still choose to own a car.

Our experience of parking issues in Nash Mills and nearby Apsley Lock

Nash Mills Wharf was built with insufficient parking. The road is private and pavement parking is managed by a private company. This means that the development itself is not littered by cars parked on pavements. However, the unfortunate neighbouring roads bear the brunt of this decision.

Apsley Lock, just outside Nash Mills, was originally built with green verges along all the roads. These were quickly ruined by parked cars and, within a short time, replaced by tarmac. Sadly, the aesthetics of this lovely development are somewhat upset by the huge number of cars parked on pavements. The parking in this estate is still a problem but is, at least, self-contained.

In contrast, **the Willows** (which sits between the two) is far less dense with minimal on road / pavement parking and provides a perfect example of what works well for an out of town development.

Cycle paths / lanes

In order to successfully increase cycling (including electric bikes) as an attractive option locally, safe cycle paths will need to be introduced into existing areas as well as new developments.

Reliable passenger transport

If travel on passenger transport is to be encouraged, that transport will need to be reliable. A great deal of needless stress was caused to many Nash Mills and Apsley residents when London Midland was replaced by London North Western in 2018. Trains were regularly late or cancelled, carriages removed and timetables changed to reduce trains, delivering a generally unreliable service during the busiest times. If we want to encourage sustainable passenger transport then there needs to be a way for providers to be held to account.

Two Waters development in Apsley

The plan shows growth plans for the Two Waters area in Apsley and mention of infrastructure development across the A414. The Infrastructure Development Plan identifies “*congestion in the Two Waters area including London Road/Two Waters Road and Durrants Hill Road*” and mentions ‘**Package 1**’ which includes “*The reorganisation of road space in the Apsley/Two Waters area to facilitate an improved streetscape*”. The detail of this (and the impact on car use in the area) is not clear. A change to improve this junction and the traffic problems would, of course, be welcome. However, the nature of the retail outlets in Apsley (DIY, weekly shopping, home supplies) and its elevation to ‘district centre’ would

surely necessitate continued easy access for cars to transport likely purchases in this area. Reducing this could further increase traffic issues through Apsley.

Included files

Title Sustainable Transport and Connectivity

ID EGS5122

Person ID 1263960

Full Name Mr Tim Amsden

Organisation Details Chairman
Tring & District Local History & Museum Society

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment DM50: I support the principle of reducing travel demand and need but this is entirely contradicted by the scale of housing development proposed. For example, TR03 is predicated on proximity to the railway station on the assumption everyone moving there will commute. DM51: intervention in the Brook Street corridor is an impossibility and development should not take place that will exacerbate the situation there. DM52: increasing Tring's population by 50% will produce a massive increase in car use especially as there is no commensurate increase in local employment. DM54 is laudable but bus provision in Tring is not remotely adequate as things stand.

Included files

Title Sustainable Transport and Connectivity

ID EGS5136

Person ID 1264550

Full Name Kevin Fielding

Organisation Details

Agent D

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	It appears that the additional greenfield developmeents around Berkhamsted are to be completed withough any "South Berkhamsted Ring Road". Already busy roads within residential areas will be detrimentally effected resulting in poorer safety and living environment for many Berkhamsted residents. A number of these roads are already the routes for Children walking to and from Swing Gate, Thomas-Coram and Ashlyns schools (for example Upper Hall Park, Swing Gate Lane, Briar Way, Hilltop Road and Chesham Road). The current South Berkhamsted development is not planned with a ring road to avoid through traffic along these residential and school roads and a link between the A4521 between Berkhamsted and Bourne end, and the A41 - A416 roundabout near Ashlyns School must be put in place if a development of this size is to progress safely.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5173
Person ID	1264509
Full Name	Hannah Fox
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5228
Person ID	1264608

Full Name	Nicola Beadle
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5249
Person ID	1264601
Full Name	Tania Barney
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Berkhamsted has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5267
Person ID	1175740
Full Name	Berkhamsted Schools Group

Organisation Details	The Berkhamsted Schools Group
Agent D	1175743
Agent Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>Sustainable Transport & Connectivity</p> <p>Policy DM 50 Transport & Movement relates to principles that will incentivise other transport modes and reduce dependency on the private car:</p> <p>We agree that development should be “in areas that provide good levels of access to sustainable modes of transport and can make provision for its improvement”. The Haslam Field site BK03 is in a highly sustainable location proven by all the relevant detailed testing undertaken by DBC and their consultants in the evidence base work. Furthermore, DBC and the last local plan inspector, fully accepted this locality as being an extremely sustainable location when allocating the Hanbury land immediately adjoining BK03, which was the only GB release in Berkhamsted. Another inspector has also just confirmed the sustainability credentials of the location in the decision notice when granting a planning appeal for 17 apartments on part of the Hanbury’s allocation.</p> <p>The BSG has sustainable travel as a core value and continues to improve transport arrangements and implements local transport infrastructure improvements, for the benefit of the whole local community. The most recent example of this was the substantial investment in the new coach/parent drop off areas in Kings Road Berkhamsted which has made a significant improvement in traffic congestion and encouraged coach travel.</p> <p>Transport to the enhanced sports offering at Haresfoot, Cy04, will be implemented in a highly sustainable way for pupils and will also reduce congestion on local roads within the town from parents particularly in the Haslam Field area on match days. Haresfoot site Cy4 is more sustainable for visiting teams and parents with easy access from the A4251 bypass and on-site buildings adjoining. Currently visiting teams/parents have to travel through the town to access any after match refreshment etc.</p> <p>Policy DM51 & 52 relate to potential transport interventions arising from DBC consultants’ reports included within the evidence base. In particular we have considered the Berkhamsted and Tring Sustainable Transport Strategy.</p> <p>We accept the general principle that all sites including BK03 must make an appropriate contribution to relevant, linked transport improvements. However, a lot more detailed discussions are required with DBC officers in due course to understand how it is proposed that these wider projects are linked, their timing and how they will be funded.</p>

Site BK03 has its own road access and is a relatively small proposition compared to some other sites. The development of 150 dwellings is not material in isolation as far as transport matters are concerned. The final growth numbers and pattern for Berkhamsted may yet change and the level of appropriate interventions will reflect that final level of growth.

Any transport interventions would be funded by a variety of methods including HCC and CIL which is particularly costly in Berkhamsted. CIL was introduced for the specific reason of securing funds from a development to invest back into local infrastructure. Any additional site/developer contributions need to be fully justified, reasonable, fair and directly linked. Viability considerations need to be carefully considered and we repeat again that the receipt from site BK03 will go directly back into enhanced education, sport, transport and infrastructure. The delivery of BK03 should not be undermined or delayed by this matter, so further detail is required.

Policy DM 53 encourages walking and cycling which is in line with the BSG's own detailed travel plan. This, together with the highly sustainable location of BK03 will maximise such movements as would the potential inclusion of some teacher accommodation, if that were to be implemented.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5293
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5338
Person ID	1264616
Full Name	Philip Daw

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Berkhamsted has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5372
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Its my view that in the immediate future we will see a significant shift to more flexible working, leading to more people working for home more of the time.We do NOT need to encourage more travel by road, unless via public transport (which should be invested in).
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5400
Person ID	1258646
Full Name	Jane Timmis

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Sustainable Transport and Connectivity</p> <p>The transport plans are not outlined here in any detail as they are dependant on outside authorities, such as Highways. Sustainable transport strategies are easier to deliver for central Hemel, but in Berkhamsted the developments of 2,400 homes are mainly on the top of the hill, at a distance from the town centre with poor road access. Persuading people to walk or cycle to the station for instance is not likely, especially not when it is raining. The same argument can be made for the North Hemel Garden Community and Tring. As acknowledged, the roads are already congested and there are no major roads East -West. This should be sorted BEFORE building. Villages such as Markyate have no travel alternatives to the car, situated as it is on a hill with most houses without a garage and an intermittent bus service. However with climate change we do need to look to change the way we use transport.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5443
Person ID	1264636
Full Name	Lynsey Bilisland
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	21. Berkhamsted already has a congestion problem with only one main road through town and only two main roads that lead into town. Traffic congestion is significant at the Kings Road/Main St junction. Buses are insufficient. Building at the top of the valley and at significant distances from town will exacerbate traffic problems as inhabitants will drive into town.

A lack of an employment strategy means that commuters will move here and will drive to the station. The traffic along shootersway is already significant after the developments at Bearroc Park and the projected developments will make this much worse.

Included files

Title Sustainable Transport and Connectivity

ID EGS5482

Person ID 1264648

Full Name Lydia Whelan

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Sustainable Transport and Connectivity comment 21.2 - yes - public transport needs to be improved particularly to link to stations.
21.3 - congestion needs to be addressed - really important to encourage greater use of walking, cycling and using reliable affordable public transport.

Included files

Title Sustainable Transport and Connectivity

ID EGS5489

Person ID 1264647

Full Name Richard Burnell

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No

* Yes

No

* No	
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5494
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	There must be safe walking and cycling routes provided. Any new developments / sites should not impact further on any already constrained infrastructure; unless measures are taken to improve the existing transport infrastructure.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5495
Person ID	1264628
Full Name	sophie boden
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment I find this section unfortunately quite condescending. We need to improve air quality and tackle climate change. Yes we do. What has Dacorum done? Where are the local fast charges for Tesla's? The nearest fast charger is south mimms, 16 miles away? How many charging points are there in town? 4 points. Only 4 points. So if you want to be green you need to install a charger outside your house. If you are lucky you can do this but for most of those in the centre of town there is no guarentee they can park outside their house, so how can they get an electric car?

All your plans to build more houses, will, in a town like Berkhamsted, lead to more petrol cars on the road.

Until you address EV charging points and how to get people to move away from driving, then you should not be looking to consult at all.

You say 'we need to plan for a low carbon and less car-dominated future' but you don't do this in your plan. You don't put amenities where you are placing more houses. You don't consider how hills impact on whether people drive or walk (have you ever visited Kings hill in berkhamsted? Or Durrants lane? Or Darrs lane? People rarely walk there, so all you are doing is putting more cars on the road.)

It is extremely frustrating to read you quoting growth plans but not actually explaining how this will improve transport. Why quote when you don't have a solution? This is not a plan.

21.11, the council are working to develop schemes. Why put something forward when you have not actually developed the scheme. This is incredibly frustrating to read.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5551
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Already congested, the plan appears to increase traffic with no solutions
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS5584
Person ID	1264363
Full Name	Roselyn King
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS5641
Person ID	1264689
Full Name	Philip Hobden
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.
Included files	

Title	Sustainable Transport and Connectivity
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ID	EGS5681
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The cost of present and future transport needs should be largely met by developers and builders who will be the significant beneficiaries of developments. The transport infrastructure should be established before development is undertaken so that potential occupiers and users of the developments can make informed choices about personal transport needs relative to environmental sustainability and climate change.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5682
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Extending housing to the periphery of Berkhamsted and Tring will increase traffic congestion and make cycling more dangerous. Currently Berkhamsted and Tring are sought after cycling destinations and contribute to tourism in the wider contest of the AONB. Increasing traffic congestion will make discourage cycling making it more dangerous and reduce air quality and turn people off cycling in our towns.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5718
Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent D	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Policy DM50 states</p> <p><i>The Council seeks to deliver Local Transport Plan 4 by facilitating a transport strategy in the following order of importance:</i></p> <ol style="list-style-type: none"> 1 <i>Opportunities to reduce travel demand and the need to travel.</i> DBC fails to meet this by promoting a string of hill-top sites 3-4km from Berkhamsted town centre and public transport. The need to travel will be increased by c15,400 car movements per day. 2 <i>Vulnerable road users needs (such as pedestrians and cyclists).</i> DBC will increase the risk to vulnerable road users in Berkhamsted by siting development on hill-top sites with steep access on narrow roads. 3 <i>Passenger transport user needs (such as bus, train and taxis).</i> This has obviously been ignored in relation to Berkhamsted. The train will be 3-4km away, buses do not serve the sites proposed and are unlikely to be commercially viable, so the expectation must be for increased use of taxis - with the consequent impact on the environment. <p>The road capacity in Berkhamsted has few opportunities for expansion due to the nature of the historic town and its valley position. Roads are already congested and nothing has been suggested tht would meet the needs of such an influx of new vehicle movements without gridlock and pollution. Thelights in the centre of the town are already at over capacity and would be a main conduit between the proposed string of developments at the top of the ridge and the town centre.</p> <p>There is nothing in the proposed plans to suggest that Sustainable Transport and Connectivity can be delivered in Berkhamsted.</p>

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5731
Person ID	1264678
Full Name	Tom A
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5744
Person ID	1264473
Full Name	Jane Read
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The proposal to include Long Marston in the Local Plan contravenes the aims for sustainable transport. Residents of the 3400 houses would be totally dependent on car transport. The nearest station is 2.5 miles away, local secondary schools

over that. The notion that bus services, even if improved, would work for this site is just not plausible. The impact on local villages, particularly on Wingrave as well as Long Marston, would be immense and lead to a huge rise not just in traffic flow but the emissions and particulates which go with traffic.

Included files

Title Sustainable Transport and Connectivity

ID EGS5751

Person ID 494828

Full Name P Marshall

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment 21.36 Welcome proactive approach to residential parking but would like an even stronger stance in terms of parking places on developments per household. Off street parking required. In small towns and villages with large stocks of Victorian housing with no off street parking provision an even greater emphasis needs to be made

Sufficient Electric charge points should be included as standard in all suitable new builds as most cost effective way of increasing across Dacorum. One per household.

DM57 Welcome specific guidance. Would like rigorous enforcing with no avoidance clauses. FTTP should be provided by additional data provision NOT by piggybacking on existing structure which then downgrades provision to existing customers.

Included files

Title Sustainable Transport and Connectivity

ID EGS5856

Person ID 1263561

Full Name Alexander Bhinder

Organisation Details

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>I imagine that we can only make decisions on the knowledge that we have. There is no crystal ball to see how transport will change over the next thirty-five years or so. On the other hand, we do have the opportunity to mould things in such a way so as to encourage change, over a period of time.</p> <p>As an engineer and someone with a scientific background, I am convinced that battery-powered electric vehicles will be relatively short lived and that alternative fuels and propulsion methods such as those based on hydrogen for example, will prevail.</p> <p>Any specific investment in battery type electric transport will have to be considered for short to medium term only.</p> <p>The proximity of homes and work must be considered, with a view to reduce work-based transport. During the past year or so, many have become used to working from home. This may be a way forward for many.</p> <p>I like the opening line of 21.3 but the proposed egress of LA1 (where I live in Grovehill) for example, suggests that these are only words. It's blatantly obvious to anyone who lives in the area, that LA1 will only increase congestion.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5885
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.

Berkhamsted is a beautiful town, ideal commuting distance from London. As I mentioned above, this is even more so since Covid. But it has the challenge of its location.

It is set in a relatively steep valley which rises over 60m from the bottom of the valley to the top. The main road up the valley, forms the high street through the town. The Railway station is near the centre of the town. There are not many alternative roads to the high street, to get from one end of the town to the other. There are few radial roads. So for most journeys from the periphery of the town, to any other part of town it is necessary to go through the centre. The result is the main junction in the town is regularly grid locked in rush hour.

The centre of the town was built in the 19th century with narrow streets and no off-street parking. In the 20th Century the town continued to expand until the periphery is no longer in walking distance of the centre.

There are no natural routes for new roads to relieve this. The existing roads are not capable of handling the existing traffic.

There are proposals to build 2,200 new houses on the edge of town. Most of these will be large family houses which will not be affordable on local wages.

No explanation has been provided as to how the town's road and transport system will be able to cope with the resultant journeys that will be generated which will result in a further 13,200 car journeys a day according to 'Trics' (Trip Rate Information Computer System).

Included files

Title Sustainable Transport and Connectivity

ID EGS5941

Person ID 1264785

Full Name Thomas Lloyd-Evans

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment	Berkhamsted's transport system - particularly rail to London - is already desperately overcrowded. Suggesting it has a sustainable transport system is laughable. This plan would obviously make it much, much worse. This would cause people to drive instead, creating more pollution.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS5988
Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>DM53 - It is all very honourable to have a policy on sustainable walking & cycling transport, but people are lazy and will take the easy option - the car. It cannot be assumed that any new development with footpaths and cycle paths will be used as intended. Tring is a predominantly a leisure destination I it is rare for current residents to cycle to around the town. The main cyclists in the town are passing through and possibly stopping off for refreshments. Therefore the benefit of local, safe routes is of less benefit to them.</p> <p>I have noticed that, during non-covid times, cycling to the railway station is popular.</p> <p>21.35 States a desire to improve the facilities at Tring station due to rising passenger numbers. I think that these plans should be revisited for the expected reduction in passenger numbers post-covid.</p> <p>DM55 Residential Parking - It cannot be assumed that garages will be used to store a car in (mainly due to the small size of modern garages and the large size of cars). Hence any provision for parking must assume at least 2 cars per household to be parked on a driveway, and sufficient visitor parking so that the roads are not clogged with parked cars, affecting the visual impact of the development.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6016

Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Berkhamsted and Tring already suffer from limited transport links and the plan does nothing to address this or promote sustainable transport. All the proposals will result in a significant increase in car usage, to the detriment of the environment.</p> <p>The mainline train service was already crowded at peak times pre-pandemic. Berkhamsted has a station but the proposed new houses are too far from the station and people would inevitably drive to the station, and Tring station is outside Tring, so more housing would lead to increased emissions from increased commuter traffic. Berkhamsted already suffers from traffic congestion and Tring High Street easily becomes congested at the slightest disruption. There is no space to widen the road.</p> <p>The 500 bus runs from Aylesbury through Tring and Berkhamsted to Hemel Hempstead but is slow and unreliable. There are few other bus routes to othe local towns and villages - for example there is one bus per week between Tring and Chesham.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6046
Person ID	1264797
Full Name	Robert Diehl
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment	Berkhamsted already has a problem with congestion and does not have a sustainable transport system. Building on steep valley sides and along ridge tops at a distance from amenities with exacerbate problems.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6114
Person ID	1264816
Full Name	Christopher Nicholls
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Appears the only scope in this plan is for more car use.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6152
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment Cars are needed to take children to and from School which means driving across Hemel and cannot be replaced by other forms of transport. Especially if the parent or grandparent then has to go to work.

The current situation with managing traffic flow in HH with regard to road repairs, gas repairs , broadband etc. is a joke. no-one actually cares do they? Use any traffic flow software?

Most traffic light are not 'smart' so do not react to traffic presence or lack thereof. Temporary traffic light are not 'smart' just put up and then nobody cares about the disruption to traffic flow. Having just put up with main road lane closures for months, an alternative route used by many was suddenly closed for road repairs without a single thought for the impact on local users.

The slightest hold up on the M1, M25 causes chaos in HH.

And the most danger I have experienced recently is from a fast cyclist passing me on the narrow pavement, kids cycling without thought under the Magic roundabout and people cycling quietly through the Marlowes that do not think you might change direction.

Included files

Title Sustainable Transport and Connectivity

ID EGS6205

Person ID 1264872

Full Name Ben Penaliggon

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No No
 * Yes
 * No

Sustainable Transport and Connectivity comment

Included files

Title Sustainable Transport and Connectivity

ID EGS6226

Person ID 1261819

Full Name	Alex Rathmell
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6259
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6278
Person ID	1264030
Full Name	Sean Collier

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	If bus services and the train stations already need improving, it is clear any growth to the area will put more strain on these services. Similarly, if roads are already congested, not only will construction contribute to this, but also the increase in population. Transport should be improved to cope with the current population first. However, I do agree with the proposed improvement to pedestrian transport to make walking more convenient.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6322
Person ID	1264918
Full Name	Denise Young
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Transport and travel should be considered and planned for PRIOR to making changes in the town. The increase in new housing built in the last 5 years is already impacting our roads, so something major needs to be done before building more. The existing roads are already in poor condition and cannot cope with current use, let alone thousands more traffic.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6326

Person ID	1261257
Full Name	Simon Tuff
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	21.1621.35DM5721.5121.52
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6338
Person ID	1264924
Full Name	Andrew Sangster
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>DM53: I think my comment may be too detailed for this consultation as it refers to detailed plans within the Local Transport Plan 4, specifically in relation to the cycleway alongside Station Road:</p> <p>The plan is to improve the shared pedestrian/cycleway, with an implication that it will remain shared. My comment is that this route should be considered a cycle-highway (not a defined term but it gets the point across): it is heavily used in the rush hours, and cyclists are not meandering and chatting to each other, they are intent to get their destination at a specific time or to get home at the end of the day; the current route shared with pedestrians is dangerous and would remain so even if the dreadful surface is relaid and a new central line drawn in the narrow pavement, or even if it were widened but remained shared.</p>

It is dangerous in good light, but awful at night given it is virtually pitch black.

The cycle lane needs to be completely segregated from pedestrians - a line down the middle and different surfaces are not adequate. The last mile can be unpleasant and dangerous as a pedestrian and as a cyclist. With the plan to develop the fields along which the route runs there is plenty of opportunity to define two distinct paths - a cycle lane alongside the road, and a pedestrian path, perhaps sitting beyond a grass verge, with the new housing and access roads beyond. The situation will only get worse because of:

- lack of parking at the station - yes, Covid experience will change things, but it is reasonable to expect, particularly given the growth in Tring and surrounding villages, that we will soon get back to the situation of car-park full by 08:30 am - people will increasingly use cycles to avoid the anxiety or fact of a full car park

- fast increasing price of station car parking - extraordinary expense, which has already driven a big increase in use of bikes in the last few years and presumably also drives an increase in pedestrian use

- improved facilities for bikes at the station - recent station improvements have led to much better bike provision, though even this was getting full at rush hour just before Covid

- awful bus service - horrible, incredibly unreliable and limited in service pushes people to make their own way to the station (note, it isn't too expensive, but still very little used for obvious reasons)

- headphones being used more and more by pedestrians making it almost impossible during the day for cyclists to flag to them in advance that they are encroaching on the cycle way (easier at night with lights); an even worse trend is seeing cyclists with headphones, meaning that for sure they will be distracted and less suited to mixed pedestrian/cycle-lane sharing

- electric assistance on bikes making them heavier (more dangerous) and faster on the uphill return journey

and finally - just try it one day (post-Covid) in the rush hour in winter and you'll see how dangerous it is.

Hence the need for segregation and treating this route as a cycle-highway, not a normal cycle path, and take the opportunity of the area being completely re-built to get it right from day 1 as an investment for decades to come and incentive for safe and effective use of cycling to and from the station.

DM56: Parking provision as planned is clearly inadequate in Tring centre - the issue seems to have been ducked in the Plan.

DM50 GP Practices: I suppose this is an issue with the planning process - the apparent lack of any planning integration with GP practices. In Tring currently the main practice has far too few parking places, leading to congestion, poor parking in the local area and general inaccessibility and stress. Presumably the planning process sees GP practices as someone else's problem, which simply means that the planning process is not reflecting the needs of the local population. And the issue is broader than that, in that surely there should be a linked GP expansion plan, which will require accessible facilities of a suitable scale for the expanded towns of Tring and Berkhamsted.

The lack of such integration is a major drawback and gap in the current plans.

DM50: Another horrible detail: in the Transport Plan the issue of how to handle increased traffic on the centre of Tring, at the main crossroads of Akeman St and High Street is ducked. It is discussed, but only to conclude nothing is planned, and indeed it is difficult - already it is dangerous, and a delivery on the High Street can cause gridlock across the junction, and overall it is a dangerous junction for pedestrians, cyclists and cars. I think a pedestrian crossing is mooted, but not traffic lights at the junction. Nor is there consideration of red-lining the area for parking - I have seen buses and lorries stuck because of deliveries to the commercial premises on the High Street, and traffic backed-up to the roundabouts at each end of the main town centre - stop the parking in the narrowest sections. But more importantly, come up with a plan that will address the increasing pressure on that cross-roads junction and the traffic flow in the centre of Tring.

Included files

Title Sustainable Transport and Connectivity

ID EGS6353

Person ID 494770

Full Name Mr John Borton

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Sustainable Transport and Connectivity comment Berkhamsted's traffic infrastructure is not adequate for the scale of the housing developments envisaged. Traffic along the High Street is often backed up with cars having to wait for 2 or 3 cycles of the traffic lights to be able to move through the town on the A4251. Few cars turn their engines off whilst stationary contributing to poor air quality in the centre of the town. A feature of the roads in the town that is not commented on in the Plan is the fact that to travel eastwards out of the town every crossing of the canal/railway routes has to pass through single carriageway bridges or underpasses. To increase the number of houses in the town by such a significant amount will just cause more congestion.

As a cyclist I am well aware of the lack of designated cycle lanes running north-south and east-west and often feel vulnerable cycling through the town as drivers often do not leave sufficient space when passing. Thus far the Council has failed to provide dedicated cycle paths not only along the valley bottom but up the inclines for those moving east and west. The valley sides are steep and it is only the fitter cyclists that can cope with the gradients. The Council's projections of increased cycle use by those in the proposed hilltop development locations are unrealistic.

Included files

Title	Sustainable Transport and Connectivity
ID	EGS6377
Person ID	1264726
Full Name	Annie Heaton
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	I support the emphasis in the plan on creating a major shift in transport modes to enable a sustainable transport system in Dacorum, based on the transport hierarchy laid out in DM50, and the onus on developers to show how they will contribute to these shifts.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6441
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The plans for transport need to join up. For example the cycle tracks in Hemel Hempstead going west stop before the eastern end of the Berkhamsted.

Pavements for Pix Farm Lane end at Winkwell where there are no pavements which seems to beg the question of where pedestrians are supposed to go safely to access the public transport beyond that point.

Included files

Title Sustainable Transport and Connectivity

ID EGS6479

Person ID 1264916

Full Name Kathryn Spall

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment There is no sustainable transport system in Berkhamsted at the moment and a congestion is already a problem. The proposed developments are a way from the town centre and up a steep valley side - building here will exacerbate the congestion problems as 2200 more households try to drive into the centre of town. To expect even a small minority to get on their bicycles for their weekly shopping is just not realistic.

Included files

Title Sustainable Transport and Connectivity

ID EGS6487

Person ID 1264936

Full Name Jane Cracknell

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No

* Yes

* No	
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6521
Person ID	1264906
Full Name	carol nutkins
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Dacorum make much of the good transport links such as M1, M25 and A41. Prior to the pandemic these links were congested, poorly maintained in some areas and we need to stop using them as reasons for people to find living here a positive. Encouraging working locally, encouraging and supporting new small businesses and new more sustainable methods of transport. More safe cycle routes, subsidised, reliable, environmentally friendly public transport is vital.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6578
Person ID	1227391
Full Name	mrs caroline shaughnessy
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No	Yes

- * Yes
- * No

Sustainable Transport and Connectivity comment

Please note

If i have not commented on every area its because I support the vision, however there are some areas I feel strongly to comment , they are also the views of the majority of local residents who probably would not have access to this.

Residential Parking : For existing properties; when new town was constructed obviously there was not as many vehicles as there are now, so parking is going to be restricted from the outset. Then add new developments with inadequate parking and this is where the problems start. Bad design (new development in Ebberns Road took away approx. 8 roadside parking by putting large driveway and garden to the front where it could have been placed at the rear thereby retaining the spaces along the road for the established cottages that do not have front gardens to put driveways in. In addition with the inadequate parking allocation on the new development in Frogmore ...Residents in Ebberns may find themselves having to pay for residents permits as they raised concerns where the new residents of frogmaore were going to park, why should they be out of pocket due to a new badly designed parking allocation for frogmore development.) That is one example but I am sure that this issue will replicate itself

I have attempted to read the parking document that has been commissioned to run alongside the development of residential property parking allocation. It is based purely on assumption and comment that has no real evidence to support the reality that exists.

It will be many decades before all diesel/petrol vehicles cease to be on the roads.

Public transport will need to be regular, clean and inexpensive before people will forego the need for a vehicle of their own.

Providing cycle storage will not deter people from owning a vehicle.

Not providing adequate parking spaces for the size of the property will not encourage people to give up on owning a car.

Fact : Parking is one of the major causes of Anti-Social behaviour and neighbour disputes, which can result in a devastating spiral of problems which end up with many agencies spending time, money and effort in resolving and at worst breakdown in communities and ultimately can end in death.

The one thing I would comment on development is provide adequate (Free) parking spaces for the size of the property. It must be one space for the number of bedrooms plus one more for visitors. This would make the areas more spacious and create a better community feel allowing for children better areas to play outside and integrate with one another again creating adhesion.

to build better communities. This in turn breeds tolerance and understanding and is a great prevention of criminality.

It all comes down to getting as many properties within the allocated area, but forward thinking and design and the long term effects on the actual residents and those in established older properties with no parking need to be taken into account over profit (developers/ council tax income-

THERE MUST BE ADEQUATE PARKING FOR ALL NEW DEVELOPMENTS NOT TO ENCROACH ON ESTABLISHED ALREADY CONGESTED RESIDENTIAL AREAS AND NOT MAKE THEM ZONE AREAS UNLESS THE RESIDENTS CALL FOR IT

This may include railway station (but parking areas should be provided at a reasonable fee and town centre which you wouldn't need it enforced if you provided 4 hours free parking for shoppers- I am an ardent shopper and even I can't shop for that long !!!

Included files

Title Sustainable Transport and Connectivity

ID EGS6612

Person ID 1265007

Full Name Duncan Brown

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

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

Included files

Title Sustainable Transport and Connectivity

ID EGS6620

Person ID 1264923

Full Name Ken Douglas

Organisation Details Secretary
TRING IN TRANSITION

Agent D

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>I appreciate the DBC has limited powers to be explicit in this space. With that in mind would it not be better (and perhaps more open?) to be clear about what is aspirational and what can be mandated.</p> <p>In the case of the former - why not invite participation from local groups to help come up with a solution that might work?</p> <ul style="list-style-type: none"> We welcome the proposals made and feel there is scope to be more specific on a site-by-site For example, part of this major development should promote the usage of shared transport schemes: <ul style="list-style-type: none"> Identify clear opportunities to use automatic electric public transportation (as proposed by developments such as Fawley Waterside). Make all of the Grand Union Canal towpath a cycle way – with particular attention to the stretch between Tring Station bridge and Berkhamsted. The towpath could then become a great off-road cycle-way between towns Free public parking for electric vehicles everywhere in Dacorum. At least until electric cars start to significantly replace petrol and cause their own parking issues Follow Oxford's example with petrol vehicle ban zones in town centres (except for residents living in those zones) at an early date. Charging points for electric vehicles to be installed at key points around new Are locations for these already allocated in the Local Plan? <p>Policy DM53 'Walking and Cycling' (Page 167)</p> <ul style="list-style-type: none"> The proposals for cycle paths around Tring do not, at present, link well with each other and this should be addressed as part of their integration with developments, in particular at Tr01, Tr02, Proposals include ensuring that paths are well lit; however, for paths close to wildlife corridors, hedgerows etc the lighting should be low or ground level, to minimise adverse impacts on bird, insect and mammal populations.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6664
Person ID	1264697
Full Name	Nicholas Wood
Organisation Details	
Agent D	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6695
Person ID	1265041
Full Name	Alastair Bulloch
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>The Transport Topic Paper makes reference to a few models that were used to drive decision making. These models used 2014 data as a starting point. Given that this data is already 7 years old, and the huge uncertainty COVID has brought regarding our commuting practices, I can not see how we have a reasonable level of input to predict the outcome on traffic of the proposed increase in housing.</p> <p>As traffic is a significant negative contributor to environmental sustainability, and the current plans only provide cursory ammendments (speifically to Berkhamsted, I can not comment elsewhere) I can NOT support this development.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6719
Person ID	1265031
Full Name	Melissa Hansraj

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Where is the "Berkhamsted and Tring Sustainable Transport Strategy"? This needs to be made available for comment by residents prior to the Draft plan being accepted. Berkhamsted and Tring are both Historic market towns in the heart of the Chilterns, both of which are reaching their limits on the number of vehicles they can deal with. Both in terms of air pollution, safety of our children walking to school and congestion on our roads. Many of the proposed plots in Berkhamsted/Northchurch are at the top of the valley. Due to the distance from the shops, schools, leisure facilities and doctors - this would result in more people driving around town. There are very few safe cycle routes around Berkhamsted /Northchurch and I suspect you will find it difficult to persuade people to cycle up and down the hills. The bus service is infrequent and due to Covid-19 most of us have avoided public transport to reduce the risk of infection.</p> <p>BK07 Lock Fields</p> <p>The entrance for this site, I presume would be off of New Road. This is already a very busy road, with high air pollution rates at St Mary's Primary School. The site is difficult to walk to due to the very narrow pavements. In fact at entrance to the site there is no pavement. The entrance is located just after the Historic Canal Bridge, which only allows single lane traffic to pass. This bridge is in need of repair and a substantial building site and increased heavy goods traffic will only accelerate the deterioration of this bridge. The entrance is also opposite the entrance to South Bank Road. This is a single track unmade private road, with no turning points. This results in all refuse trucks and delievery vans having to reverse in (by turning in New Road) or reversing into New Road! This will be incredibly dangerous with a new housing development entrance opposite. Many parents and children of St. Mary's Primary school walk past the South Bank Road entrance to get to school - this new entracnce to the development will put their safety at risk.</p> <p>The junction with the High Street is already very busy and the air quality is poor. A child was knocked down on this High Street not far from this junction and very sadly past away due to her injuries. Sending more vehicles through this junction and onto the High Street will only put more children at risk.</p> <p>BK06 Darrs Lane</p> <p>This housing development is at the top of a steep valley, with all the amenities at the base of the valley. Therefore people will use their cars to access these creating further pollution and congestion. Access for a new secondary school is very difficult being located at the top of a steep valley, on a single track road with no pavement. This is unsafe for pupils walking to school.</p> <p>BK01</p>

Chesham Road is a steep one-way road with narrow pavements. It is the main walking route to Ashlyns secondary school for many children. It is dangerous to locate the entrance to BK01 off of Chesham road. As this will increase the traffic on this already gridlocked road (during school run) and will increase the pollution levels. There are also road safety concerns for the many children who use this route. Ideally this road should be turned into a pedestrian /cycle route only (during school run).

Included files

Title Sustainable Transport and Connectivity

ID EGS6753

Person ID 1265006

Full Name Tracy Bownes

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Sustainable Transport and Connectivity comment Berkhamsted and areas of Hemel Hempstead have congestion problems.
 The market town nature of Berkhamsted make it challenging to see how the inevitable increase in town centre traffic from the Berkhamsted South proposals will be managed. While there has recently been investment in additional town centre parking, the train station (pre CoVID) was often at peak capacity, and the train services congested. Without significant employment opportunity increases, I am concerned the rail transport links will become a further problem.
 In Hemel the magic roundabout and M1 access from the A414 are often congested. Furhter development of the Maylands estte and the additional housing at Hemel Garden will add further congestion.
 The proposed development at Hemel Station car park needs further examination. This car park too is often at full capacity, and with no nearby alternatives, I am confused by the proposed housing development.

Included files

Title Sustainable Transport and Connectivity

ID EGS6790

Person ID 1265061

Full Name	Mark Nethercoat
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Sustainable Transport and Connectivity:</p> <p>Great to see these plans, but after the changes brought on by COVID19, and the massive increase in working-from-home, many external predictions are that in 2021 and beyond, that there will be a significant reduction in commuting. As a result of this, my view is that the overall road developments need to be refreshed and revisited - The requirements on which they are currently based have changed substantially, making them no longer a proper reflection of future needs.</p> <p>For cycling plans, these are all nice and fluffy, but as a regular commuting cyclist, with recent experience of commuting Hemel/Berlhamstead and Hemel/Croxley, the plans provided are a good start. But I am yet to be convinced that the cycling plans have been written with the involvement of somebody who actually commutes across/between towns, and would be more than happy to become involved with these futures plans, providing help and assistance as needed.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6812
Person ID	1265036
Full Name	Tom Burrows
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment	These developments will only cause more congestion and pollution. Why don't you divert some of the funding to repairing the shocking roads throughout dacorum.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6850
Person ID	1263500
Full Name	Jessica Haigh
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<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> <p>Additionally, there is a severe lack of public transport in both Berkhamsted and Tring, especially from some of the proposed development sites. This will cause a need for cars and personal vehicles to enable residents to move around, leading to a severe increase in traffic, and even more congestion.</p> <p>Also, there are multiple lanes near Shootersway which are single track or extremely narrow. Will these be expanded due to the increase in demand for these lanes? How will these cope with the increase of households using them. A lot of these roads including Shootersway and Durrants lane are quite unsafe when it gets busy and congested. The issue of potholes and road maintenance also needs to be considered. A lot of these roads are currently extremely poor quality now. There will be a great need for road management with all of the additional road use. Can you promise this will be something the council focus on?</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6856
Person ID	1264920

Full Name	Anna Wellings Purvis
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Agreed that we need a lower-carbon and less car-dominated future. Electric car charging points would help. Hemel Hempstead desperately needs more public transport provision in the east side of town, both bus and mass transit, as it is a 55 minute walk and sometimes an hour by two buses just to reach a train station in Hemel Hempstead. Roads are likely to become more congested, especially with this building plan, so it should include overpasses and additional road capacity or some form of rail or tramway. My concern is this plan will make transport more difficult.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6866
Person ID	1265079
Full Name	Darly Rattigna
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	the edge of town, hilltop locations proposed in berkhamsted are difficult to cycle and walk to. this means that journeys to and from the Bk01 South Berkhamsted site in particular will be car based. The south Berkhamsted site alone could therefore generate, based on a 2 adult household, at least 3200 rush hour car journeys a day (one journey for each adult, morning and evening, based on 800 units being proposed). This is not sustainable frm an environmental or congestion perspective

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6912
Person ID	1265063
Full Name	Richard Scott
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Berkhamsted has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.</p> <p>Within the plan, one of the main development sites is accessed at the top of Swing Gate Lane - which will act as its primary access road. This road currently has two schools on it Swing Gate Lane and Thomas Coram School. With the number of additional cars expected to travel on this road, as the most direct access to Berkhamsted Town Center, numbering over 1,000 - this is a clear safety issue and is against your road safety Strategy. This plan is clearly inconsistent and is unsustainable.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6922
Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Sustainable Transport and Connectivity comment	
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6951
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	I do not feel that the assessment that Berkhamsted has a sustainable transport system is correct. There is far too great a dependence on cars to support a growing town. Building even further out, beyond easy walking distance to the town centre will further exacerbate the problem.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6974
Person ID	1264453
Full Name	Fiona Hinton
Organisation Details	Myself
Agent D	1264426
Agent Name	Fiona Hinton

Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Berkhamsted runs through a steeply sided valley, and most proposed development is earmarked for the top of hills, a walk that is physically beyond many members of society. In reality, no matter what busses are provided, many people will drive to the high street area. This will exacerbate the high pollution and congestion levels that already exist. The proposal mentions that plans for more transport infrastructure will come later, but approval of this stage should not be considered without firm transport infrastructure commitments. This goes completely against the alleged environmental sustainability of the proposal. I would also note that there are existing transport issues in Berkhamsted that could be alleviated with, for example, a 'circuit' bus to make it easier for people living at the tops of the valley to access the High Street without using their car. The fact that this does not exist highlights the fact that lip service is frequently paid to environmental issues without being backed up by action. I suspect this would continue to be the case if this proposal went ahead.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS6999
Person ID	1265105
Full Name	Jonathan Tay
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	I can see nothing in the plan that will significantly mitigate the increase in road/rail users as a result of building 16.5k new homes. Most people will not be convinced out of their cars by an improved cycle lane (particularly between October to March, or on wet or windy days), and trains to London are already full at peak times, what will it be like by 2038? There's a lot of words, but actually very little being done to improve transport given the scale of house building planned.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS7084
Person ID	1265144
Full Name	Michael Williams
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>The Berkhamsted developments are mainly at the edge of town. As Berkhamsted is in a valley, new residents will need to use private vehicles to travel into town and connect with public transport like at the train station. The proposals in these locations are for family homes. It is not practical or realistic to expect children or less mobile residents to travel by foot or bicycle from these developments.</p> <p>This is even-more true considering that the routes into town and to the railway station are through lanes and narrow residential roads with on-street parking. It is not uncommon for cars to be parked on both pavements leaving just a single car width of road for all parties to fight and use.</p> <p>The proposed sites will cause immense congestion on those roads, increasing pollution and traffic noise.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7114
Person ID	1262099
Full Name	Chris Taylor
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Sustainable Transport and Connectivity comment	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, along with the high concentration of house typical of these new sites.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7133
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Connections, including transport is key to the functioning of modern sociey. I brroadly support most of the policies here but would suggest that the Council fully supports the regrowth of integrated public transport, so as to support the full range of residents in Dacorum.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7143
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Please see comments above. Proposed development in Tring is unjustifiable and disproportionate. Existing infrastructure in Tring is inadequate.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7165
Person ID	1265127
Full Name	Jason Foxwell-Moss
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	IF things return to our pre-COVID ways of working, are the local roads and rail facilities adequate to manage the large numbers of new residents? 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?
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7178
Person ID	1265129
Full Name	Karen Foxwell-Moss
Organisation Details	
Agent D	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Any meander or drive through Berkhamsted High Sreet and the surrounding streets will inform even the casual observer that Berkhamsted has a congestion problem. It certainly does not have a sustainable transport system as DBC suggests. The new homes will be located on steep valley sides and along ridge tops at a distance from facilities which will mean that there will be many more cars travelling through the town and the congestion will simply get worse. It is ridiculous to suppose that people located in the new developments will use cycles to get up those steep hills when they could instead use their cars. How on Earth will all the cars fit on the main roads through town?
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7179
Person ID	1265157
Full Name	Lynnsey Walker
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	There is nothing to suggest the plan has considered sustainability in Berkhamsted. with regards to traffic in Berkhamsted. Even a simple step like the inclusion of cycle lanes has not been added to the plans.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7227
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Easier to implement this in a town like Hemel, but you can be certain of one thing - every one of those new households proposed for Tring would be reliant on at least one car in their household! Sad, I know, but true!
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7239
Person ID	1265142
Full Name	Alan Anderson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Re 21.18 / DM50 & 52, in so many cases, targetting cars is unfair on existing residents who do not have access to public transport, and walking/cycling are wholly unrealistic. Yes we need to make transport considerably more sustainable in new developments, but I am stronly opposed to blocking the road network to existing residents who do not have access to public transport. I am also opposed to preventing new developments without sustainable transport options, because if there aren't any of these options, then it is not the fault of these developments. In other words, HCC needs to provide the public transport, rather than say development cannot take place because there isn't any.</p> <p>Re 21.41 / DM55, I strongly support having a car parking standard that requires a sensible minimum amount of car parking to be provided with new developments, which takes into account the sustainability of where the development is located - in the centre of well served settlements, less is required than in our villages, but it is critically important that enough parking is provided in our villages and other remote locations.</p>
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS7247
Person ID	1264956
Full Name	Caroline Heard
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7305
Person ID	358532
Full Name	Ms Gillian Culham
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	21 Sustainable transport Transport: for the mayland area business park how about introducing trams a circular route, that moves about the area from Hemel – trading estate, and out to the Garden communities, going towards Potten end and round again.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7367
Person ID	1265362
Full Name	ROSEMARY NORTH
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>I am responding by email as I 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 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.</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> <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.</p>
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS7571
Person ID	1265607
Full Name	Victoria Hayes
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<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>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7801

Person ID	1148738
Full Name	Ian and Claire Field
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	(21) Sustainability Transport Connectivity – many of the towns and villages mentioned do not have sustainable transport systems in place already, despite what DBC suggests. For example in Berkhamsted, building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS7871
Person ID	1265975
Full Name	Clare Smith
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	(21) 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.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS7929
Person ID	1262335
Full Name	Penelope Harrison
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	• 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS8086
Person ID	1266049
Full Name	Mike Plowman
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS8225
Person ID	1266154
Full Name	Iain Smith
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	(21): 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS8271
Person ID	1266165
Full Name	Nicky Kaleniuk
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	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.

The local plans for the area, and of boxmoor do nothing to alleviate my worries about this, and fills me with dread!

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.

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.

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.

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.

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.

Please consider residents views and stop the overdevelopment of this wonderful area.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS8275
Person ID	1266166
Full Name	Martin Scicluna
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<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>

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	Sustainable Transport and Connectivity
ID	EGS8576
Person ID	1266567
Full Name	CAROLINE SMALES
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS8674
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>Transportation matters within the local plan, must be in conformity with Hertfordshire’s Local Transport Plan 2018-2031 (known as LTP4), which was adopted by the county council in May 2018. LTP4 outlines the county council’s transport policy by providing a policy foundation for a balanced approach to transport and consistently promoting and enabling sustainable transport and sustainable travel behaviour, in order to support better economic, social, and environmental outcomes for the county in a context of</p> <p>LTP4 key messages are as follows:</p> <ul style="list-style-type: none"> • Supporting and enabling a shift to sustainable transport; • Policy, design and decision-making based around the Transport User Hierarchy which means prioritising, planning and designing first for reducing need to travel, people walking and cycling, and then public transport, ahead of other motorised vehicles; • Enabling walking and cycling including through infrastructure improvement and increasing priority of people walking and cycling (policies 7 and 8); • Supporting bus services through infrastructure including bus priority measures (Policy 9); • Travel/Traffic Demand <p>Policies within LTP4 will not support development where private car use is the only opportunity for travel, with the hierarchy of preference of provision being ordered as follows: walking, cycling, public transport, car This approach is in line with the National Planning Policy Framework (NPPF) regarding the achievement of sustainable locations for development.</p> <p>Due to the partly rural nature of the borough, private car ownership is high and there are high levels of vehicle movements travelling into and out of the plan area as well as private vehicles travelling through to reach other destinations. As a result, there are significant challenges in providing development that is sustainable in terms of highways and transport in the</p> <p>Any improvement measures outlined in the plan that are associated with new developments, will need to be assessed by the county council through either a Transport Statement (TS) or Transport Assessment (TA). These will need to be submitted as part of any planning applications that will consist of 10 dwellings or more, as outlined in the county council’s document: ‘Roads in ’ These documents will be reviewed by the county council to ensure that any impact is adequately mitigated with appropriate improvement measures.</p> <p>The county council would like to stress the importance of non-car permeability in new developments and the need for developers to prioritise non-car movement. LTP4 encourages sustainable modes of transport (walking, cycling and passenger transport provision) in all new developments by deterring car use through car park and access charges, and lower levels of parking provision in urban centres. It can also include the reallocation of road space from general traffic to sustainable modes or restricting vehicles and through traffic (this includes filtered permeability, a technique that maintains walking and cycling access, but restricts vehicle flows).</p>

Further detailed comments in relation to specific policies supporting text and sites within the plan are outlined in Section 11.

SECTION 21: SUSTAINABLE TRANSPORT AND CONNECTIVITY

Transport. The county council considers that this section of the plan should contain a section on behaviour change through Travel Planning and other similar initiatives before the car parking section to incorporate the softer measures to encourage sustainable transport at new developments (and also outside of this voluntary Travel Plans and School Travel Plans that can be taken up by existing developments).³ Reference could also be made to Travel Planning work being undertaken through SmartGo Maylands and interventions envisaged as complementary to the infrastructure schemes proposed in both the Hemel and Tring and Berkhamsted Strategies.

Figure 9 Local Transport Plan 4 Strategy Diagram

Transport. Reference to: 'Roads in Hertfordshire: A Design Guide' is currently being updated and will have a new It is suggested that it should instead be referred as: 'HCC's relevant design standards.'

Paragraph 21.7

Transport. The sustainable transport strategies that are mentioned within this paragraph, have a different focus and structure to the Urban Transport Plans (although they effectively supersede the 2012 Urban Transport Plans), as they are not simply the new name for Urban Transport Plans, as the way this paragraph is written appears to suggest.

Paragraph 21.9

Transport. This statement should be strengthened so that more focus is given to sustainable modes of travel along movement corridors in Hemel Hempstead, and the text should be updated accordingly to reflect this. Interventions that encourage sustainable and active modes of travel will need to play a key part of these movement corridors as they will encourage a modal shift away from private car

Paragraph 21.10

Transport. It is suggested that the text within the paragraph is amended as follows:

~~"The interventions for Hemel Hempstead also enable a transition towards are along similar lines but also take into account the need for more significant interventions, such as the future development of an East West A414 strategy and Mass Rapid Transit system as identified in the A414 strategy. study, given the scale of growth in and around the town. The Strategy sets out the long term vision to meet longer term modal shift aspirations."~~

Paragraph 21.12

Transport. It is suggested that the following wording is amended in this paragraph, as the East Hemel Hempstead MRT, is not being planned as a park and ride:

"...and will expand the possibility for users to combine travel modes such as walking or ~~driving~~ cycling to the interchange..."

Transport. It is good that the draft local plan recognises the longer-term aspiration for the MRT scheme. Although not reliant on the MRT system, development within the plan should facilitate the provision of supporting and enabling

infrastructure to allow a transition towards a full MRT system. Land for multi modal interchanges (MMTIs) for example could be safeguarded within developments and in the shorter term these could be developed to provide community facilities, improve access to bus services and opportunities for bike share and car share schemes.

Paragraph 21.14

Transport. The requirement for a greater uptake in walking, cycling and passenger transport needs to be among existing residents as well as in new developments. It is suggested that the following wording is amended in this paragraph as follows:

“These focus on identifying and costing interventions on sustainable transport routes, which will enable travel choice from the new developments to key destinations in the towns, whilst also improving options for existing residents.”

Paragraph 21.15

Transport. Safe, direct access for pedestrians, cyclists and public transport users from new developments to key destinations needs to be designed in from the start.

Paragraph 21.16

Transport. The county council would still expect developers to consider and contribute towards measures to encourage use of bus and rail where appropriate, which could be infrastructure, services or Travel Planning It is supported that walking and cycling routes should be provided and supports a sustainable transport network in the rural area, enabling greater connectivity and a reduction in the need for private vehicle use.

Paragraph 21.17

Transport. In relation to a new northern corridor to serve Hemel Hempstead we would like to see consideration given first to opportunities to maximise sustainable modes of transport and then determine the residual impact of vehicular traffic on the surrounding highway network using traffic modelling to see if additional highway capacity (i.e. a new northern corridor) is required. More details on this will be available once the transport work for the Hemel Garden Communities to develop a transport strategy (Stage 2) has been completed. This paragraph needs to be updated accordingly to reflect this.

Policy DM50: Transport and Movement

Transport. It is suggested that an additional paragraph is included within the bullet points at the end of paragraph 2:

e) Work with developers to safeguard land where relevant for future transport provision (e.g. Multi Modal Transport Interchanges future MRT system).

Paragraphs 21.13-21.17

Transport. The text within these paragraphs do not relate to the MRT proposal or the A414 strategy but are more general. Suggest that text has a new subheading or is moved up to before the MRT / A414

Policy DM51: Supporting and protecting land for transport interventions

Transport. In relation to a new distributor road through the North Hemel growth area, the county council would like to see consideration given first to sustainable modes of transport and then vehicular traffic to determine if a new distributor road is required. Bullet point A needs to be re-worded accordingly to reflect this and the Northern distributor road should be referenced as the northern sustainable

Paragraph 21.23

Transport. When referring to vehicle access, the county council would be seeking access points, design and wider arrangements/connections to fully align to the user hierarchy which should be demonstrable.

New access arrangements should firstly be designed to enable direct safe access from the development to key destinations by non-car modes. Any new highway accesses should then be designed to safely accommodate the predicted levels of residual car trips. Roads in Herts, or any replacement document is the main document covering requirements for Transport Assessments/ Statements, processes involved and design considerations, this should be mentioned HCC's Travel Plan Guidance relates to the requirements surrounding Travel Plan production and content. Consultation is required with HCC Development Management Team (who involve other relevant teams in HCC as appropriate).

Policy DM52: Movement and Access

Transport. Paragraph 2, bullet point b, which states: *“provide access to public transport and contributes to the required infrastructure to support it”* has not been amended following previous comments and does not adequately cover all that we require bus-wise of new

The county council requires bus stops within 400m of all dwellings (also applies to other development types) or 200m in town centres, at educational establishments or where there is a significant elderly population. HCC also requires all developments to contribute to infrastructure improvements (or provide on-site), which can mean bus stop infrastructure and/or bus priority measures as appropriate and also service improvements (which can mean a diversion into the site) where current service provision is not at a level that would encourage usage. Service frequency should be at a level to encourage usage and ideally provide access to key destinations (this being dependent on what the development can fund and the bus network).

Walking and Cycling

Transport. As walking and cycling make up the two most sustainable forms of transport and feature high in the Transport User Hierarchy, design of all new transport infrastructure within or delivered by new development (all land uses) should clearly demonstrate the Transport User Hierarchy, including prioritisations at all junctions, crossings or possible conflict points throughout. Consideration of vehicle parking (planned and informal) should also be evident to ensure modes higher in the hierarchy are not negatively impacted by parking or access arrangements. This is in addition to site wide (master planned) evidence of the user hierarchy being applied to the layout and access points for each mode.

Policy DM53: Walking and Cycling

Transport. The opening text within this policy, should be amended as follows:

“All development proposals will be expected to promote safe and attractive walking and cycling provision to nearby employment, essential services and community facilities, or other key destinations by the following:”

Paragraph 21.34

Transport. With regard to the last sentence of this paragraph, the approach should be to enable full journeys sustainably and policy should fully support converting whole journeys to sustainable modes, not only in

Policy DM54: Passenger Transport

Transport. The policy needs to mention the accessibility criteria that the county council uses this is the first step and fundamental to ensuring developments are accessible by If service diversion is required to meet this, then site design needs to be appropriate for bus operation, if not high-quality pedestrian/cycle access to stops.

Stops should be designed with high quality infrastructure and enable access for all users. The county council requires that bus stops are within 400m of all dwellings (or other land uses) or 200m in town centres, educational establishments or where there is a significant elderly population. Bus stops should be designed to enable access by all potential users (including those with disabilities) with high quality infrastructure, easy access kerbing, shelter and display screens where There should be good pedestrian/cycle access, appropriate lighting and surveillance.

Paragraph 21.41

Transport. This paragraph should be reworded, as car parking does not maintain vitality and viability of town Accessibility to these areas does. This assumes continuation of dominance of car usage.

Parking Provision-Residential

Transport. The county council would welcome the flexibility for centrally located sites to have low/no parking, which could be included in Policy DM55: Parking Provision-Residential. HCC would also support reduction in parking levels if the market demands for parking can be evidenced. The parking section should have its own areas for cycle and motorcycle parking standards and design principles, and this should outline a provision aligned to the vision of the LPA and the intended significant uptake of cycling sought and required by this plan. There should also be a reference to the potential for car clubs in larger

Digital Connectivity

The county council welcomes this section within the draft local plan that aims to expand gigabit connectivity in the borough, through the role out of Fibre To The Premises (FTTP). The LPA should be aware that HCC has been part of the 'Connected Counties' joint partnership since 2014, which is a consortium between HCC, Bucks County Council, Hertfordshire Local Enterprise Partnership and BT that aims to deliver superfast broadband (measured as a minimum of 24Mbps download speed) in areas not commercially covered by BT, Virgin, Sky, Gigaclear and other

As the county seeks to become a county with 100% coverage of superfast broadband it is essential that all new developments are constructed with Superfast Broadband availability. Access to broadband is a vital component of infrastructure in today's It is key to growing a sustainable local economy, vital for education and home working and an increasingly central part of community cohesion and resilience.

LPA's and property developers have a pivotal role to play in ensuring they do what they can to 'future-proof' new developments by installing direct fibre. Installation of FTTP Broadband is free for developments of over 20 premises since a 2016 agreement.

Developers should therefore make contact with network providers as soon as possible they can to discuss this, as FTTP superfast broadband will be free, so long as providers are informed in good time. Current providers, including Openreach and Virgin Media, can all deliver direct fibre access services if given sufficient

Policy DM57: Digital Communication

In the light of the above, it is suggested that the following amendments are made to this policy:

1 *All qualifying development shall deliver Qualifying development includes:*

all residential and employment schemes proposed in, or adjoining, the main towns and large villages and in the remaining parts of the Borough; and

~~residential schemes promoting 10 dwellings or more in the remaining parts of the Borough; and employment schemes promoting 10 or more jobs (FTE) in the remaining parts of the Borough.~~

Transport. In order for HCC to be confident in the delivery of the sites or their required transport measures further work on many of the sites is required. Having not been involved with the call for sites stage of the emerging plan, the comments made are cautious, reflecting the lack of information available to the county council when reviewing the draft local HCC sees our comments as part of the plan's ongoing development, although it should be noted that if the comments raised within this representation cannot be resolved it should be considered that HCC would object to those aspects of the plan at the forthcoming Regulation 19 proposed submission stage.

New access onto principal routes would not be supported unless special circumstances can be evidenced, as set out in LTP4 policy 5. This will require specific agreement from HCC prior to inclusion within the plan.

All infrastructure delivered by the sites should align to the transport user hierarchy, which should be demonstrable in its design. The county council recommends the removal of 'where possible' in transport policy relating to walking/cycling routes where no key destination is given. HCC would actively encourage LPA's and Site promoters/developers to actively seek (and potentially create) new sustainable transport routes and connections as well as considering how the existing public rights of way network can be enhanced and new public rights of way provided. HCC would also welcome the inclusion of 'current standards agreed by the highway authority' when describing the upgrading/enhancement of

Bus accessibility criteria requires access to bus stops within 400m. Where this isn't existing for sites, it has been noted. Sites should seek to enable access within 400m or reduce/mitigate the distance via design. This is relevant to the scale and location of the site and existing bus provision. All sites would be expected to fund enhancements to bus services.

With regard to large growth areas ('large' is relevant to existing settlement scale), the county council would support specific policy for larger sites to include the development of a transport design code in agreement with the Highway Authority to ensure the requirement for high quality transport design are met and

With regard to 'Areas of Growth,' the county council would welcome development areas where policy for transport measures to mitigate the impacts of growth can be addressed. This could include areas with a group of sites in an existing settlement, or a collection of development sites in smaller settlements (villages).

Included files

Title Sustainable Transport and Connectivity

ID EGS8741

Person ID 1266752

Full Name Jayne Spademan

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment In regards to Sustainability - (21) 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 only seek to exacerbate these problems.

The Council's proposals are neither justifiable or sustainable. Opposition is covered in detail in the BRAG response and further reiterated above.

Included files

Title Sustainable Transport and Connectivity

ID EGS8746

Person ID 1266755

Full Name Philip Spademan

Organisation Details

Agent D

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	In regards to Sustainability - (21) 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 only seek to exacerbate these problems. The Council's proposals are neither justifiable or sustainable. Opposition is covered in detail in the BRAG response and further reiterated above.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS8817
Person ID	1158356
Full Name	Colin Blundel
Organisation Details	Planning Officer Chiltern Society
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Policy DM50 - Transport and Movement – This policy should include a reference to the strategy being prepared by England's Economic Heartland for the surrounding region. That is seeking to develop alternatives to road transport, incorporating the digital economy. Covid-19 has also changed working patterns, with many more people working from home and the need for travel greatly reduced. This change is unlikely to be reversed and should be recognised in the Plan. Policy DM52 - Movement and access – Again, this seems to be based on the assumption that people will continue to move around to the same extent. The policy needs to consider potential future scenarios relating to travel needs for work and leisure. A separate policy could be added to encourage and support home working to reduce the need to travel. Policy DM53 - Walking and cycling - The Society supports this policy.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS8972
Person ID	1266893
Full Name	PENNY HARRISON
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS8978
Person ID	1266926
Full Name	Mr Mark Finnie
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	I object to the proposed development of new housing in Northchurch on Darrs Lane and New Road.

The proposed development will greatly increase congestion on the roads in the area. The junctions where New Rd and Darrs Lane join the high st are already congested. Adding hundreds of new houses and thus cars will make it much worse. The current infrastructure of shops, schools, doctors etc will be put under increased pressure.

The proposed developments will fundamentally change the character and feel of the area for the worse.

The proposal to remove the name of Northchurch and call it West Berkhamsted is insulting to the residents of Northchurch and should be dropped.

The Council should reconsider whether all of this additional housing is really necessary.

Included files

Title Sustainable Transport and Connectivity

ID EGS9030

Person ID 1267011

Full Name Mr Louis Quail

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment **Transport**

Any increase in housing , needs to come with a plan to get cars off the road and anyway its way past it time to fund an electric bus shuttle for our towns especially in Berkhamsted because the hills force people to drive. The new Car Park in Berkhamsted only encourages more journeys for carbon emitting vehicles and its timing now is a huge mistake, the council must rectify this by making carbon neutral journeys a priority with an electric bus shuttle and by installing a massive array of charging points for those with no off road car parking .

Included files

Title Sustainable Transport and Connectivity

ID EGS9075

Person ID	1267067
Full Name	KATHRYN BROWN
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Sustainable Transport Connectivity: as I have mentioned before Berkhamsted is often highly congested along the High St and at the main traffic lights intersection with Kings Rd. As soon as there is a problem on the A41, traffic is fed through Berkhamsted. In addition to this, were many many new houses to be built on Green Belt land between Berkhamsted and Bourne End, we would have a huge upsurge in vehicles being driven into the town centre. I don't see how this can work efficiently alongside our already busy High St/Kings Rd pinch point.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9102
Person ID	1267074
Full Name	Joanne Howe
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	(21) 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.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS9159
Person ID	211352
Full Name	Mr Andrew Sanderson
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>The Plan accepts that Berkhamsted is congested, while going on to propose developments 3-4 km from the town itself. There is no transport policy now and none is discussed as a solution to the existing problems.</p> <p>The consequences of the traffic measures envisaged for Hemel Hempstead are not considered but I have raised my concerns earlier. This whole section is a laugh – or it would be if it were not so serious.</p> <p>More detailed comments are made in the BRAG document and I agree with everything they say.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9237
Person ID	1264686
Full Name	Suzanne Doubleday
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9290
Person ID	1267333
Full Name	JO MURPHY
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9312
Person ID	1267332
Full Name	Nandi Jordan
Organisation Details	Chair Berkhamsted and Tring Labour Party
Agent D	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations.</p> <p>All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points.</p> <p>Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9415
Person ID	1267392
Full Name	TANYA VERBEEK
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	(21) 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9425
Person ID	1267395

Full Name	SIMON WEBB
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Providing an off road two way cycle way from each development to the town centre and railway station with electric scooter scheme
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9507
Person ID	399324
Full Name	Ms Julie Hollway
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>DM50 (“Transport and Movement”) states a transport strategy will be adopted that will reduce dependency on private cars by locating “development in areas that provide good levels of access to sustainable modes of transport and can make provision for its improvement.” As above, reliance on cars will INCREASE with developments 3.5 or 4km from the station.</p> <p>DM51 (“Supporting and protecting land for transport interventions”) states that “Land identified through the Sustainable Transport Strategies as important transport corridors will be protected for transport interventions and will be retained as its existing designation until such a time where the land is to come forward for development. These corridors include: [...] South-North movements to Berkhamsted Town Centre including Bell Lane, Durrants Lane, Swing Gate Lane and Woodland Avenue. [...] Major development along these corridors will be expected to contribute towards the delivery of</p>

interventions identified in the Sustainable Transport Strategies, beyond those necessary to make a scheme compliant ...”. Ridiculous..... Bell Lane is a tiny rural single-track lane that does not lead to Berkhamsted Town Centre - thankfully it cannot be widened due to soft verges, established ancient hedgerows and natural habitat and is incapable of functioning as an “important transport corridor”.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9531
Person ID	1267427
Full Name	Megan Humphreys
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9623
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes	

* No	
Sustainable Transport and Connectivity comment	(21) <u>Sustainability Transport Connectivity</u> – Berkhamsted has a congestion problem, trains are at capacity and buses mainly only run along the valley corridor weekdays, very sparse service in evenings and weekends. The geographical nature of the landscape does not support cycling and walking and the distance of proposed developments from the town centre and station will add to this.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9638
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	(21) 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9709
Person ID	1267479
Full Name	Roger Harrison
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9711
Person ID	1267479
Full Name	Roger Harrison
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> 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. <p>We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9721
Person ID	1267480
Full Name	Paul Townsend
Organisation Details	

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS9776
Person ID	1267528
Full Name	Clare Williams
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>Firstly, I would like to record my opposition to the proposed development at Bulbourne Cross. I am very concerned about the level of marketing they have been able to use and wonder how this is allowed as separate to the overall plan, if Dacorum borough council are not allowed to market in the same way then surely this is unfair competition.</p> <p>I also want to record my opposition to the scale of the proposed Local plan at Berkhamsted due to the fact that it includes building on green belt land and does not adequately address the issue of increased traffic and pollution in such a small town.</p> <p>I would also like to request that more council housing is built and smaller more affordable housing rather than all the huge very expensive housing that seems to be evident in the current housing development off shooters way.</p> <p>I am pleased to see proposals for new schools but we need more on accessibility into the town for all (bus routes and safe cycle paths).</p>

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 Sustainable Transport and Connectivity

ID EGS9877

Person ID 1267757

Full Name SIMON SMITH

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity 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.

Included files

Title Sustainable Transport and Connectivity

ID EGS9930

Person ID 1267774

Full Name AATMA SEESURRUN

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Sustainable Transport and Connectivity comment 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.

Included files

Title Sustainable Transport and Connectivity

ID	EGS10053
Person ID	1155402
Full Name	Christopher Stafford
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	(21) 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10183
Person ID	1268084
Full Name	KATIE FERGUSON
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Please take this email as my formal response to the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Consultation.

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.

To build on my support for BRAG ;, there are a number of concerns that have been raised around the viability of this plan, particularly around the impact in significantly reducing existing green belt land (going against government recommendations) and putting increasing pressure on the town's already strained infrastructure. There are no clear exceptional circumstances that can provide a reason for this type of rapid over development. Berkhamsted and Tring are both towns where the surrounding countryside is a significant factor in their character, appeal and history, with the proposed plans drastically reducing this and having a significant negative impact for residents and visitors. As someone who sees outdoor recreation as a key part of their lifestyle, this also will destroy my (and others) enjoyment of the green space that surrounds Berkhamsted, with the ease of reach being a key factor in its appeal. The green space is home to hundreds of diverse species and environments; building on it will further damage flora and fauna.

As more and more towns across the UK are being "swallowed up" by vast amounts of housing and attempts at regeneration, Dacorum should not go in the same way. The road and traffic infrastructure is not sufficient to handle additional volumes, and there is no ability to "create more roads" therefore it will only add to the problems of congestion and pollution as has been identified. The locations of the proposed sites at the top of the valley will only exacerbate - many will choose to avoid walking or cycling up the hill and therefore have an even greater multiplier effect on the number of cars being used. Similarly, having commuted from Berkhamsted into London for a number of years, it is incredibly evident that trains are already at (and over) capacity.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10228
Person ID	1268167
Full Name	CHRIS YOUDELL
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10280
Person ID	399324
Full Name	Ms Julie Hollway
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	DM50 (“Transport and Movement”) states a transport strategy will be adopted that will reduce dependency on private cars by locating “development in areas that provide good levels of access to sustainable modes of transport and can make provision for its improvement.” As above, reliance on cars will INCREASE with developments 3.5 or 4km from the station. DM51 (“Supporting and protecting land for transport interventions”) states that “Land identified through the Sustainable Transport Strategies as important transport corridors will be protected for transport interventions and will be retained as its existing designation until such a time where the land is to come forward for development. These corridors include: [...] South-North movements to Berkhamsted Town Centre including Bell Lane, Durrants Lane, Swing Gate Lane and Woodland Avenue. [...] Major development along these corridors will be expected to contribute towards the delivery of interventions identified in the Sustainable Transport Strategies, beyond those necessary to make a scheme compliant ...”. Ridiculous..... Bell Lane is a tiny rural single-track lane that does not lead to Berkhamsted Town Centre - thankfully it cannot be widened due to soft verges, established ancient hedgerows and natural habitat and is incapable of functioning as an “important transport corridor”.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10404

Person ID	1268432
Full Name	SARAH STUBBS
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10458
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Electric car charging points must be mandatory for all new developments.</p> <p>Safe cycle paths to town centres and rail stations and secure bike storage should be provided in town centres. The provision of cycle paths must be mandatory to any development.</p> <p>Public transport should be greatly improved and electric vehicles should replace diesel buses. Public transport connectivity to railway stations must be greatly improved, particularly in Tring where it is out of town.</p>

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10512
Person ID	1264641
Full Name	Chris Mack
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<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> <p>1) The huge increase in the number of houses in the borough will negatively and permanently change its nature.</p> <p>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.</p> <p>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.</p> <p>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.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10683
Person ID	1161079
Full Name	Melanie Llewellyn

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The Plan accepts that Berkhamsted is congested, while going on to propose developments 3-4 km for the town itself. There is no transport policy now and none is discussed as a solution to the existing problems. The consequences of the traffic measures envisaged for Hemel Hempstead are not considered but I have raised my concerns earlier. This whole section is a laugh – or it would be if it were not so serious. More detailed comments are made in the BRAG document and I agree with everything they say.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10724
Person ID	1145421
Full Name	Mrs Shirley White
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10743

Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations.</p> <p>All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points.</p> <p>Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10815
Person ID	1268768
Full Name	Amanda Stafford
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	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.

(22)

Included files

Title Sustainable Transport and Connectivity

ID EGS10873

Person ID 619474

Full Name Miss Brenda Mariner

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment Access to areas has been mentioned but no consideration for Wheelchair access and emergency vehicles. Parts of the town are on steep slopes which could cause problems. Other areas have congested parking which already prevents access by Refuse Collection vehicles.

Included files

Title Sustainable Transport and Connectivity

ID EGS10959

Person ID 1268886

Full Name Mr Paul Jayson

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS10995
Person ID	1268904
Full Name	NICOLA MAGUIRE & MARK BONAR
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	* 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11032
Person ID	1268910
Full Name	SIMON LAWSON
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	I live in Berkhamsted and am concerned that the Plan takes no account of the town's geography, including its valley setting. Most of the new building proposed will be in Greenbelt land above the valley. There are no significant proposals to upgrade roads and traffic flow, or to improve cycle routes and public transport. In consequence, the new residents are likely to drive into town in their cars, leading to increased pollution, which will naturally collect in the valley. This situation will have adverse implications for public health and for the Council's ability to meet Climate Change and air quality targets.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11050
Person ID	1160525
Full Name	Mr John Hislam
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Pedestrians</p> <p>All future planning developments should include consideration of allowing better pedestrian access to / from the location to other strategic locations. This should assist people's choices with respect to use of cars in favour of walking. In addition, accessibility ramps should be more widespread to assist those with impaired mobility.</p> <p>In this respect it must be noted that villagers try and avoid the pavements / paths along Chesham Road due to their narrowness and speed of traffic – especially heavy goods vehicles. The pavement along Chesham Road should be widened with the overgrowth of trees cut back</p> <p>Cars and Parking</p> <p>All future planning developments should require adequate arrangements for off-street parking. Where necessary parking areas must be included within the developments' curtailments. Developers should be required to reinstate verges etc. that become damaged as a result of their activities.</p>

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11082
Person ID	1268918
Full Name	Richard Friend
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>I live on Orchard Avenue [XXX], and have some serious concerns with the proposed local development plan.</p> <p>The Dacorum Local Plan (to 2038) does not sufficiently consider the government’s Ten Point Plan for a Green Industrial Revolution (Nov 2020), or the government’s Cycling and Walking Investment Strategy (April 2017) – and may consequently leave the council vulnerable to legal action.</p> <p>Specifically, the tokenistic references in the Plan regarding contributions to “off-site enhancements to the local road network” do not clearly delineate plans for traffic calming measures and segregated cycle lanes/footpaths, which would reduce air pollution and increase the viability of walking and cycling for short journeys in Berkhamsted.</p> <p>West Berkhamsted currently has an average of 1.48 motor vehicles per household, in 2,401 households. According to the plan, the proposed development in the West Berkhamsted area will create 1,860 households – which will lead to 2,753 additional motor vehicles on Berkhamsted roads, with next-to no commitment to sustainable local travel provision for the thousands of families in the town.</p> <p>Most of the additional motor vehicles will frequently use Shootersway and Kings Road for commuting and town centre access. The junction of these two roads has already seen a deterioration in air quality since the opening of Bearroc Park and the multistorey car park. The air quality at the junction of the high street and Kings Road has also degraded in the same period. Both junctions are a thoroughfare for school children as they make their way to local primary and secondary schools – currently with negligible infrastructure to support them.</p> <p>The current version of the plan does not adequately address four of its own objectives: ‘Mitigating and adapting to climate change’, ‘Conserving and protecting the natural environment’, ‘Promoting and facilitating sustainable transport and connectivity’ and ‘Supporting community health, wellbeing and cohesion’. If these points are not addressed, then the council may endure protracted legal proceedings.</p>

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.

Included files

Title Sustainable Transport and Connectivity

ID EGS11129

Person ID 1268953

Full Name Ms Susan Johnson

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment There is little admission that the topography of Berkhamsted dictates the way residents travel (mostly by car, due to the steep hills) and the resultant traffic burden on the town centre and its feeder roads.

Included files

Title Sustainable Transport and Connectivity

ID EGS11132

Person ID 211222

Full Name Mr Adrian Howe

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment	<p>Dacorums roads are already highly congested in places and this plan places almost all of the development on the fringes of the towns further increasing road traffic. Due to the distances involved promotion of walking and cycling will only have a limited effect.</p> <p>The proposal to build a new link road from B440 to M1 Jcnt 8 without a proper feed from the A41 is ridiculous as most traffic will avoid central Hemel Hempstead and congest alternative local routes through small communities.</p> <p>The plan appears to involve restricting the width of the already very busy A414 St Albans Road to accommodate a new Mass Rapid Transit system to Harlow and other public transport initiatives. as a result central Hemel Hempstead will become very congested especially on the Leighton Buzzard Road B440. Traffic from Berkhamsted and Tring will undoubtedly want to avoid this and find rat runs through places such as Potten End and Water End. These alternative routes are totally unsuitable and will be very dangerous to local residents. This will be accentuated by the massive unnecessary increase in the size of Tring and South West Berkhamsted.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11239
Person ID	1262469
Full Name	Mark Waters
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Tring Town is already a very busy place and although the aim of providing a significant percentage of affordable homes is to be encouraged, somehow appropriate infrastructure such as Doctor's Surgeries, Dentists, Schools, Car Parks, Transport etc., seem to me in this, as in other schemes to be generally, badly, underestimated.
Included files	
Title	Sustainable Transport and Connectivity

ID	EGS11269
Person ID	221884
Full Name	Ms Eliza Hermann
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Policies DM50 - DM53 regarding Transport, Movement, and Walking and Cycling are good. Unfortunately, the rest of the proposed Plan and all of its detailed proposals do not comply with these policies:</p> <ul style="list-style-type: none"> • promoting development in areas with good access to sustainable transport is laudable, but most of the proposed development locations at Berkhamsted are counter to this because they are located far from any public transport, too far from the town centre for walking, and located at the top of the steep hillsides making cycling transport unrealistic. These Berkhamsted locations will be car-dependent, and access to the nearby A41 at these locations is already very dangerous because the two junctions (at Bourne End and at Kingshill Way) both have tight corkscrew on-ramps and off-ramps and very short acceleration and deceleration lanes. Increased car-use and traffic on the A41 stemming from development within Dacorum and in nearby Buckinghamshire will make these two Berkhamsted A41 junctions even more dangerous than they are • promoting walking and cycling networks is also laudable, but there is a lack of such provision currently, and most of the proposed development locations at Berkhamsted are too far from the town centre and at the top of the steep hillsides to ever make walking and cycling realistic for everyday In addition, walking along the existing pavements on Kingshill Way and Shootersway is unpleasant and unsafe due to both the traffic speed and the narrow width of the pavements in many places, resulting in pedestrians having to frequently step into the road.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11304
Person ID	1268999

Full Name	Mr Birkett Birkett
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11387
Person ID	1207629
Full Name	Strategic Planning Department
Organisation Details	Strategic Planning Department Three Rivers District Council
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Policy DM50, DM51, DM52 and DM53 (DM50 – Transport and Movement, DM51 Supporting and protecting land for transport interventions, DM52 – Movement and access, DM53 – Walking and cycling): We are supportive of these policies and their content in seeking to achieve a modal shift from private car use towards sustainable travel modes.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11429

Person ID	1269025
Full Name	JOHN MAWER
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>1 Sustainable transport and connectivity Many opportunities to improve access for cyclists. Berkhamsted talked of creating a cycling route between Berkhamsted and Hemel, making use of Pix Farm Lane and Chaulden Lane. This chimed with Bourne End's proposals for the surrounding rat run lanes. The idea needs revitalising.</p> <p>On these matters generally, as research has shown, it needs an element of brutality to make it happen. (However, the current LTP4 from HCC is a classic example where vision fails to be delivered.)</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11447
Person ID	1264362
Full Name	Juliet Miller
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations.

All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points.

Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.

Included files

Title Sustainable Transport and Connectivity

ID EGS11598

Person ID 1269148

Full Name SIMON AND ANNA BARNARD

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment **Policy DM50 - Transport and Movement** – This policy should include a reference to the strategy being prepared by England’s Economic Heartland for the surrounding region. That is seeking to develop alternatives to road transport, incorporating the digital economy. Covid-19 has changed working patterns, with many more people working from home and the need for travel greatly reduced. This change is unlikely to be reversed and should be recognised in the Plan. The provision of a major new road from North Hemel Hempstead flies in the face of this new approach to travel and is very outdated. It is totally unnecessary and unwanted having severe consequences for the surrounding areas and settlements.

Policy DM52 - Movement and access – Again, this seems to be based on the assumption that people will continue to move around to the same extent as pre pandemic. This policy outdated and unnecessary and must be reconsidered in the light of changes in living and working practices.

Included files

Title Sustainable Transport and Connectivity

ID	EGS11686
Person ID	1269212
Full Name	PETER SCOTT
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations. All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points.</p> <p>Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11729
Person ID	1152494
Full Name	MRS G RUSSELL
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment	Re 21: Sustainable Transport and Connectivity. There must be investment in a realistic network of charging points for electric vehicles. Planning permission for all new homes must require charging points. Improved public transport can reduce but not obviate the need for private cars.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11796
Person ID	1269238
Full Name	Dr Jill Timms
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>2. Transportation - we are very aware of the key impact our transport system has on our ability to address the climate crisis, and whilst we recognise some concessions towards public transport, an opportunity is missed to re-design our local transport system and fundamentally change citizen use of the car to public and sustainable transport. Some creative thinking for the use of electric public transport and much more integrated and regular services would be a start.</p> <p>a. Much more could be done to provide opportunities for pedestrians to get safely where they need to be. The increase in school children for example should be matched by more paths and safe road crossings for routes to and from. This is also the case for safe and increased opportunities for cycling throughout the area, with more provision for cycle racks and space for family biking. Two specific examples would be the need to provide more pedestrian priority in Tring and Berkhamsted town centres and high streets, and also provision of a safe pathway for bicycles and pedestrians from Aldbury to Tring Station, which currently is only a permissive path that is unsuitable for bikes or buggies.</p> <p>b. Public transport is not covered enough in this plan, which continues the 'business as usual' approach of catering for and reaffirming a lifestyle of households having one or two cars, or even more. We know this is unsustainable and we have here an opportunity to nudge towards a different norm, but to do so we need to include as central to this plan, a completely renewed and integrated public transport system. This would see more routes as well as more frequent public transportation connecting the different places people need to be, and particularly for connecting to the rail network.</p>

Moreover, this system should be contributing to the electrification of all transport, so away from fossil fuels. This would mean public transport that is accessible and clean.

c. Although the importance of train travel has already been noted, but it is very concerning that this local plan does not take into consideration the serious impact it would have on an already overwhelmed system - and this is particularly true of Tring Station. As a local resident and as a supporter of public transport, increased use of train travel will take more cars off the streets and provides a potentially cleaner form of travel. However, we also see the impact on the local streets and area of the huge numbers of people using Tring and its facilities (when not in the pandemic). Although parking there does not impact us personally as we have our own, it is clear that usually by before 9am the car park can be full. Previous discussions and debates have not arrived at any workable solution for increasing capacity, however despite this more people are being encouraged to use it - with new houses for sale as far as Aylsebury quoting the time to London from Tring as the best station to use. With this plan, but no solution to railway capacity, is storing up significant problems for the future. Rather than create more space, the best answer environmentally would be to have a workable public transport system to facilitate the connection to the station from local areas to meet need and reduce the need to drive and park at the station. The better upkeep of the cycle paths and increased numbers of them to the train station could also encourage fewer cars - but bike parking would need to be increased even further, and also this does not solve the problem of trains being full without all the increase in commuters that the new plan would bring.

d. Following on from the point above, when people do drive to the train station, there would be an opportunity to strongly encourage the use of electric vehicles by having a significant number of charging points in the car park of Tring Station. Indeed, beyond this more charging points and the potential for each residence to have access to a charger is going to be necessary for most by 2030 and so this is an opportunity to address this as a cornerstone of our planning.

Included files

Title Sustainable Transport and Connectivity

ID EGS11891

Person ID 1269277

Full Name DEFINE PLANNING AND DESIGN LTD

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

Sustainable Transport and Connectivity comment	<p>POLICY DM50 – TRANSPORT AND MOVEMENT:</p> <p>BHL supports the scope of Policy DM50 and the intention to promote accessible development and active movement as required by the NPPF.</p> <p>However, the policy includes language that is open to interpretation. Indeed, requirement 2d states that proposals should “<i>where possible [...] promote the usage of shared transport schemes.</i>” That wording is not “<i>clearly written and unambiguous, so it is evident how a decision maker should react to development proposals</i>” (NPPF paragraph 16d) and should be re-drafted with that in mind.</p> <p>POLICY DM57 – DIGITAL COMMUNICATIONS:</p> <p>BHL recognises the importance of digital connectivity, and support Policy DM57’s scope. However, given that the policy requires all development to provide FTTP infrastructure, demand for such infrastructure must be justified by up-to-date evidence (NPPF paragraph 35b).</p> <p>In addition, it would appear more suitable for the policy to require developments to adhere to the latest Building Regulations, particularly given the ESFG recognises that the government has “<i>plans to amend Building Regulations to ensure that all new homes have the right infrastructure to support gigabit broadband.</i>” Indeed, that approach would also future-proof the policy.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11945
Person ID	1150963
Full Name	SUE TAYLOR
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Berkhamsted and Northchurch sit in a valley, air pollution monitoring in Northchurch shows that in still conditions air pollution is very high around the High Street as air pools in the base of the valley.</p> <p>Five of our schools, several doctors surgeries, most of our retail areas, Churches and our most important recreational route the Canal lie in the valley. Any increase in traffic will adversely impact air quality and residents health. As roads</p>

need to be crossed to get access to schools this presents road safety issues too which are not adequately addressed on the local plan.

Even if electric cars reduce emissions dust from tyres and brakes and noise from traffic will still have an impact.

The Local plan proposals will increase the number of journeys internal to the town proportionately so about 50% in Northchurch, in addition Tring residents often use facilities in Berkhamsted and Hemel so we can expect a further large increase of traffic on both the High Street and the A41 from the large developments proposed in Tring and further afield in Aylesbury.

A large development is also proposed in Ashley Green and these resident will look to Berkhamsted more than Chesham for local facilities further increasing traffic in the town and pressure on our facilities.

I live in (address removed), already there are frequent traffic jams as people seek to bypass the High Street. Just today (Monday 10am) I saw the local bus having to stop while 3 cars reversed to let it through and this is during lockdown when traffic levels are low.

The situation is similar for parts of Shrublands and Charles Street. There are also problems with congestion on most of the north south roads on the south side of the valley. There is simply no capacity for the additional traffic that would be generated by these proposals, or room to make additional capacity through our narrow streets and lanes.

Berkhamsted High Street is notorious for its long queues to the central traffic lights, there isn't additional capacity here either.

The local plan does not address these issues except with vague plans for cycle routes and extra paths, but unless these can avoid steep slopes and link into the heart of town (where there is no room for such measures to be implemented) this will not make any impact.

We need as a community improved public transport links that would see buses along the top of the valley and not just the base. It is the hills that make the current bus routes inaccessible to many people and prevent many people from walking and cycling to get shopping.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS11967
Person ID	1269350
Full Name	Jan Dent Safer Gravel Path Action Group
Organisation Details	SECRETARY Safer Gravel Path Action Group
Agent D	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	21) 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS12134
Person ID	1269413
Full Name	Mr Chris Wallis
Organisation Details	Hon. Director of Development Tring Sports Forum
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>1 Sustainable Transport & Connectivity</p> <p>21.18 TSF find the minute detail in the Berkhamsted and Tring Sustainable Transport Strategies document beyond belief. Why is there so much detail at this stage? There are not even layout plans published yet for the main proposed development sites, just a couple of extremely small-scale block plans pertaining to the main sites, so why is the transport strategy as defined in Policy DM50 detailed to this degree, when the Draft Master Plan has not yet been tabled? Many of the suggested solutions as detailed by the Consultants will surely change following the hoped-for stakeholder agreement of the Masterplan for Tring. In addition, there are glaring errors in the presumptions that have been made, e.g. A secondary school on Dunsley Farm? The words in Policy DM50 are just that – ‘words.’ The solutions proffered by the DBC fail to achieve the transport strategy as stated; TSF will suggest a safe, financially sustainable and environmentally sound solution, linking in all amenities to the East of Tring.</p> <p>Policy DM50 Transport & movement</p> <p>No objections</p>

21.20 There are other small parcels of land that could be obtained by DBC to achieve a 1st Class solution to the above; all this could be explained by TSF in detail.....

Policy DM51 – Supporting and protecting land for transport interventions

No objections

21.21. Although not a developer, TSF is more than happy to use its very local knowledge and influence to assist DBC in its goal.

Policy DM52 Movement and access

No objections

Policy DM53 Walking and cycling

No objections

Policy DM54 Passenger transport

No objections

Policies DM55 & DM56 - Parking provision

Policies DM57 & DM58 – Digital & Mobile Connectivity

No objections

Included files

Title Sustainable Transport and Connectivity

ID EGS12237

Person ID 1269478

Full Name NIGEL TAYLOR

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment 1 A sustainable transport study needs to be developed to describe how each town will support the increased traffic levels as a result of the new development before the plan is adopted. Given the suppressed commuting levels as

a result of Covid 19 pandemic the whole local planning process should be delayed until this may be completed after traffic levels return to normal.

The plan must address the issues described in the section on Transport later in this submission.

- 2 Hertfordshire County Council (the transport authority) must take responsibility for the ongoing funding and provision of new transport services before the new houses are built. This should be funded by taxes and charges on the new development.

Included files

Title Sustainable Transport and Connectivity

ID EGS12278

Person ID 1264925

Full Name sharon warner

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Sustainable Transport and Connectivity comment Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.

? Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Included files

Title Sustainable Transport and Connectivity

ID EGS12340

Person ID	1269489
Full Name	STEVE HILL
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity 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	Sustainable Transport and Connectivity
ID	EGS12385
Person ID	232349
Full Name	Mr Lawrence Parnell
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Transport.</p> <p>Para. 23.168 speaks of constraints:</p> <ul style="list-style-type: none"> • Traffic growth in the TRDC area. • Congestion in High Street / Watford Road • Capacity issues on the M25 and A41

Omitted from mention is the potential for an off-line MOTO Motorway Services at the M25, Junction 20, just yards from the DBC border. Beyond mention of a future improvement to J20 (para.10.4) (unspecified as to when) the Local Plan makes no comment as to how the constraints might be eased. Worse, the quantum of new homes planned for Hemel Hempstead, Berkhamsted and Tring will result in exponential traffic growth on the A41 and A4251, and into/out of J20. DBC must maintain a close interest in and respond to TRDC and the Highways Authorities on the MOTO proposals. The latest (February 2021) from MOTO is a proposal to add an extra approach lane onto the J20 roundabout from each of the M25 (east and west), and the A41 (north and south), with no increase in scope of the roundabout itself nor consideration for the A4251. Madness!

Further, within the DBC Local Plan, there is no reference to, or acknowledgement of, the HGV traffic flows generated by the Kings Langley Employment Areas – Sunderlands Yard and those in the immediately adjoining TRDC area in Primrose Hill, Station Road and Home Park Mill Link Road – let alone how improvements might be achieved.

Also unconsidered is the role of the A4251. This road, as High Street and Watford Road, is first a conduit for through traffic travelling north/south, notwithstanding the role of the A41. It is also a relief road whenever any of the M25, J20 and/or the A41 are jammed. Kings Langley is immediately and directly impacted.

The A4251 is also a receptor for local distributor roads; from the east Gallows Hill, Station Road, Toms Lane and Primrose Hill via Waterside, The Nap, Church Road and Home Park Mill Link Road/Watford Road, and from the west, Chipperfield Road, Langley Hill, Vicarage Lane, and Common Lane, the latter set being under additional pressure twice every weekday from schools traffic.

Such is the impact of traffic on Kings Langley that, notwithstanding the primary duties lie with other Authorities / Agencies, the Local Plan is seriously deficient if it fails to specify DBC’s objectives and intentions for Kings Langley in DM51.

As if to underline this, the laudable aims of para. 2.14 cannot be believed whilst the locations listed in para 23.168, plus adjacent J20, do not merit an AQMA and inclusion at para.18.53.

Rail. Given the significance of the mainline to commuter and local journeys through Dacorum it is noticeable that there has been no consultation with Network Rail or Rail Transport Operators. Surely their medium/long term intentions for services is essential consideration, bearing in mind consequences that may follow the commissioning of HS2, increased commuter usage consequent upon population growth in Dacorum, Three Rivers and Watford, and the potential of Kings Langley for Park & Ride given its proximity to the M25 J20, M1 and the A41. In recent years Kings Langley has also been suggested as an interchange for trains to/from the north (consequent on HS Phase 2) linking direct to the Channel Tunnel.

Included files

Title Sustainable Transport and Connectivity

ID EGS12417

Person ID 1269503

Full Name Mr Jan Wosiek

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Para 21.25 This statement runs contrary to the developments outlined in BK06,07 and 08. DM52: I fail to see how the developments above align with this policy para 1, b&c.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS12440
Person ID	1146040
Full Name	Mrs Rachel Macdonald
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Sustainable Transport and Connectivity All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations. All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points. Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS12470
Person ID	629143
Full Name	Mr Chris Briggs
Organisation Details	Spatial Planning Manager St Albans City & District Council
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>5. Transport</p> <p>SADC generally welcomes the emphasis on sustainable transport within DBC's Local Plan. However, we consider that these policies could be strengthened in terms of sustainable and active travel to enable the ambitious modal shift targets. Potential changes (subject to the SADC Local Plan process and ongoing Duty to Cooperate discussions) to paragraph 21.12 are:</p> <p><i>"The Mass Rapid Transit proposal spans both the A414 Strategy and Hemel Hempstead and has notable mention within both strategies and as previously mentioned will be supported by a number of new MMTIs. This will predominately feature within the Hemel Garden Communities area and is being discussed as part of ongoing joint working with St Albans City and District Council. It the Hemel Growth Area in St Albans district and would expand the possibility for users to combine travel modes such as walking or driving to the interchange and reducing the need for journeys to be carried out entirely by car."</i></p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS12696
Person ID	1269597
Full Name	Ms STEPHANIE HOWE
Organisation Details	

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>The roads around here are full up already, most side roads more like car parks than streets. If you are putting in 25% more houses here, there must be an increase of more than 25% of traffic. All the major developments are on the outskirts of the towns, therefore people will need to drive everywhere and I imagine there will be gridlock.</p> <p>Living in Potten End I am extremely worried that the road though our village will become a major feeder to the new proposed link road, otherwise it means the traffic from Berkhamsted, Tring etc will have much further to travel if they don't use our road to shorten their journey.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS12742
Person ID	1250257
Full Name	Kate Harwood
Organisation Details	The Gardens Trust
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>Policy DM58 Mobile Communications lists Chilterns AONB, listed building, sites of archaeological importance or of nature conservation importance as constraints in siting of development. This should include at the least those Parks and Gardens on the Historic England Register as setting, both of the Registered landscape and the buildings it contains is of importance to its significance (HE GPA3.2 <i>Setting of Heritage Assets</i>).</p>
Included files	
Title	Sustainable Transport and Connectivity

ID	EGS12749
Person ID	1250256
Full Name	Herts Gardens Trust
Organisation Details	Herts Gardens Trust
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Policy DM58 Mobile Communications lists Chilterns AONB, listed building, sites of archaeological importance or of nature conservation importance as constraints in siting of development. This should include at the least those Parks and Gardens on the Historic England Register as setting, both of the Registered landscape and the buildings it contains is of importance to its significance (HE GPA3.2 <i>Setting of Heritage Assets</i>).
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS12898
Person ID	1207443
Full Name	Mrs Jennifer Bissmire
Organisation Details	Clerk Markyate Parish Council
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Ref 21.1 <input type="checkbox"/> .. villages that are located away from key inter-urban bus corridors are not as well served.

Markyate (and Flamstead) are separated from the rest of the Borough by a ridge of the Chiltern Hills. Our 'main' route is the A5/A5183. There are inter-urban bus services but that along the principal route the A5/A5183 connects St Albans with Dunstable, neither are in Dacorum and the latter is in a different County. The other bus service does end in Hemel, but originates in Luton and goes to Hemel via Flamstead and Redbourn so it is not a good service for Markyate. Markyate Parish Council would wish to see some policy directed to serving our residents transport needs. This should include the need for private transport, the acceptance that we do have parking needs that should be met, that restricting traffic by pedestrianisation in town centres should still leave a way for cars coming into the town and that the ridge in the Chilterns makes walking and cycling away from the Ver valley with the A5/A5183 impractical, particularly as the local roads are narrow with no footways.

These transport issues are further reason to reject further building in Markyate.

Policy DM51- Markyate Parish Council commend this policy as leaving options open for future road improvements. Ref 21.2

Ref 21.3

Mention is given to road congestion at peak times but is not extended to cover the impact of delays on the M1 which overspill onto local roads. As Markyate is so close to M1 Junction 9, the village is subject to severe problems in this regard. London Luton Airport developments will add to the problems, so Markyate Parish Council welcomes the Dacorum BC input into London Luton Airport Consultative Committee (LLACC) to influence infrastructure provision which is very important to our parishioners.

Parking Provision - Residential

Ref 21.40 The Dacorum Local Plan recognises that insufficient parking provision in developments can cause problems.

Markyate Parish Council know this all too well from recent building in the village. The roads are already severely congested by parked cars to the point that emergency access is often compromised. It is further reason to oppose further development in Markyate. Digital Connectivity and Mobile Communications

Ref 21.50

Ref 21.51

These policies are supported by Markyate Parish Council – we have a growing number of residents who work from home and need reliable fast internet connections.

Included files

Title Sustainable Transport and Connectivity

ID EGS12994

Person ID 1269778

Full Name STEPHEN BLADEN

Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>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.</p> <p>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.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13054
Person ID	1270013
Full Name	Mr Daniel Ritchie
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations.

All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points.

Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.

Included files

Title Sustainable Transport and Connectivity

ID EGS13232

Person ID 1270134

Full Name Mrs Louise Bladen

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Sustainable Transport and Connectivity comment Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.

Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Included files

Title Sustainable Transport and Connectivity

ID EGS13248

Person ID 1270143

Full Name Mr Thomas Parsons

Organisation Details

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity. Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13329
Person ID	1270200
Full Name	Mr Richard Harman
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> 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.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS13368
Person ID	924129
Full Name	Mrs Natalia McIntosh
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	(21) Sustainability Transport Connectivity – Tring and Berkhamsted have a congestion problem and do not have a sustainable transport system as DBC suggests. Building on sites at a distance from facilities will exacerbate problems.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS13395
Person ID	1153922
Full Name	Roger Hyslop
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	(21) 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.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS13435
Person ID	1270263
Full Name	MRS SHARON O'SULLIVAN
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Section 21 Sustainability and Connectivity Policy DM52 - Movement and Access. This policy states that "Development proposals will be expected to minimise the need to travel by car in the first instance" Three examples of achieving this are listed, including gigabit capable broadband but there is no mention at all of home working.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13550
Person ID	1260521
Full Name	Steve Ritchie
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations.

All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points.

Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13580
Person ID	1227768
Full Name	Ms Denise Young
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity. Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13684
Person ID	1207133
Full Name	Chilterns Conservation Board

Organisation Details	Chilterns Conservation Board
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	DM55 and DM56 Parking Requirements Comment. The CCB considers that these policies would benefit from referring to the Chilterns Buildings Design Guide as part of the supporting guidance. DM58 Mobile communications Support.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13760
Person ID	1270372
Full Name	Janet Tuppen
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	17. Berkhamsted and Tring Sustainable Transport study – this is frankly over optimistic in its assessment. For Berkhamsted, it suggests that Charles St is used by cyclists as it is a traffic-free cycle route – the assessor has clearly never been along that road! It also suggests that measures which might turn routes other than the High Street into rat runs should be avoided – however they clearly already are rat runs. For instance, I always use Bridgewater Road to travel from Berkhamsted to Northchurch. It also suggests that increased housing won't add much to traffic congestion. It also implies that the infrequent bus services will increase (with no evidence), and it suggests there will be a bus route

through the new South Berkhamsted development (again with no evidence to back this up). Finally, on p.71 - 5. 'Key challenges' the report states that the study has been prepared between April-July 2020 – during Covid 19. *“The methodology of this analysis had therefore been adapted, replacing on-site observations made in person in each towns with desktop analysis conducted using online aerial and ‘streetview’ photography as a tool to understand the existing situation in the towns. It is acknowledged that whilst it is considered the alternative approach is as sufficiently robust as possible, there are some more detailed observations and measurements that are more difficult to obtain using online tools.”* Under the challenges section the study is more realistic, talking about the narrow roads, lack of dedicated cycle paths, and lack of bus routes in a north-south direction in the town, the lack of space for a double-decker bus to service the station, and it admits the Charles St/Westfield Rd is a rat run, **but overall the report is too weak to rely on for accurate information.**

17.1 In the Climate Change Topic Paper it states on p.6 that:

“The NPPF addresses several mitigation-related policy issues, including the need to encourage sustainable transport modes by designing and locating development to reduce the need to travel.”

17.2 **The transport study does not represent adequate research into sustainable transport. The idea that people in new houses at the top of the hill in Berkhamsted with no level access to shops will cycle down to the high street and back up (with their shopping) is a total fallacy. From my own experience, in the last 5 years or so, there has been a marked increase in SUVs in the town centre. On some of the Victorian streets it used to be possible for 2 cars to pass each other, next to a single row of parked cars. It is now not possible to do that in some areas when either the parked cars or those travelling in the opposite direction are SUVs.**

17.3 In fact, a study just published by the National Audit Office shows that carbon emissions from passenger cars across Britain have fallen by just 1% since 2011, despite a steep rise in the sale of electric and hybrid vehicles, due to the popularity of sports utility vehicles (SUVs) and an increase in road traffic.

<https://www.theguardian.com/environment/2021/feb/26/suvs-and-extra-traffic-cancelling-out-electric-car-gains-in-britain>

17.4 Overall, I do not accept that there will not be an increase in traffic in Berkhamsted. A 25% increase in housing will result in a similar increase in vehicles, with associated issues of air pollution and gridlocked streets.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13797
Person ID	
Full Name	
Organisation Details	
Agent D	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>? 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.</p> <p>? 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.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13819
Person ID	1270385
Full Name	Ms Katy Regan
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>Transport and Infrastructure</p> <p>An efficient public transport network enables people to travel directly to their destination quickly. For public transport to be viable, it must also be popular, full or near full capacity. At present we have a problem that buses are insufficiently popular, and so will go 'round the houses' to gather sufficient passengers. However, this leads to longer journeys, which</p>

encourages people to find alternatives. If you can buy a house then buying a car is also likely to be available to you, and so this becomes the choice made by many of our residents.

Housing is not often built with transport in mind, but any new housing estates in Dacorum must be constructed with a road layout which encourages bus and train use, and topography allowing, bicycle use. When we allow developers to build executive housing on the outskirts of Hemel, Tring and Berkhamsted, we must be aware that those that can afford this housing, which is far above the affordability ratio used by the Office for National Statistics of 4 times salary, will likely be working in London, and will therefore be expecting to take the train to commute. It is essential that any new housing development include a transport plan which does not rely solely on cars, both as part of our Climate Change obligations, and since the capacity of many of Dacorum's roads simply cannot hold any further traffic. Family homes must be within easy and safe walking distance from schools, and if they are not, then these trips must also be included in the transport plan.

In the current local plan many of the large housing estates proposed are far from the train stations in Dacorum, and there is no explanation provided as to how the people who live in these homes will travel to and from work. On top of this, the housing on many of these estates will include large numbers of executive homes where one or more adult is likely to be commuting to London. This Local plan places the people most likely to need easy access to the train station, and most likely to be able to afford a car, in the position that they will need to use a car to get to work every day.

Neither our transport network nor our environment can withstand the resultant increase in car journeys.

We are pleased to see, in The Draft Infrastructure Plan for Dacorum the Transport User Hierarchy which requires the County Council to design any scheme and develop any transport strategy in the following order:

Opportunities to reduce travel demand and the need to travel

- 1 Vulnerable road user needs (such as pedestrians and cyclists)
- 2 Passenger transport user needs
- 3 Powered two wheeler (mopeds and motorbikes) user needs
- 4 Other motor vehicle user needs

Draft Dacorum Infrastructure Delivery Plan Policy 1

However, there is also an infrastructure prioritisation which will guide spending on infrastructure. This defines infrastructure improvements as Critical, Essential and Required with Critical having the highest priority.

Table 8 of the Draft infrastructure delivery plan details the priorities of proposed infrastructure, and we note that overall, schemes which are designated to have 'lesser relevance' are cycle way improvements and other green infrastructure. It is essential that environmental improvement schemes are not competing for funding with major road improvement

schemes. To date Garden Communities schemes across the country have found that the vast majority of funding has been spent on road improvements, and this is not a mistake we can afford to repeat.

Included files**Title** Sustainable Transport and Connectivity**ID** EGS13849**Person ID** 1270387**Full Name** Mr Richard Pilkinton**Organisation Details****Agent D****Agent Name****Agent Organisation****Yes / No**

* Yes

* No

Sustainable Transport and Connectivity comment The guiding development policies do not address sustainable transport and connectivity for communities that are located away from the A41 corridor. These communities depend on private transport, and need access to parking provision not blocked by pedestrianisation in town centres. Communities to the East of the Borough also suffer from overspill onto local roads when there are delays on the M1. London Luton Airport developments will add to the problems, guiding development policies need to address this. I am pleased that Dacorum is represented on London Luton Airport Consultative Committee (LLACC) to address our local issues.

Included files**Title** Sustainable Transport and Connectivity**ID** EGS13864**Person ID** 611689**Full Name** Mrs Sheila Pilkinton**Organisation Details** Markyate Parish Council**Agent D****Agent Name****Agent Organisation**

Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	The guiding development policies do not address sustainable transport and connectivity for communities that are located away from the A41 corridor. These communities depend on private transport, and need access to parking provision not blocked by pedestrianisation in town centres. Communities to the East of the Borough also suffer from overspill onto local roads when there are delays on the M1. London Luton Airport developments will add to the problems, guiding development policies need to address this. I am pleased that Dacorum is represented on London Luton Airport Consultative Committee (LLACC) to address our local issues.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13899
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Sustainable Transport and Connectivity All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations. All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points. Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.
Included files	
Title	Sustainable Transport and Connectivity

ID	EGS13984
Person ID	1270411
Full Name	Ms Jacqui Parr
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> • Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity. • Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS13997
Person ID	1270412
Full Name	James Mullins
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment	(21) 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.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14055
Person ID	1264962
Full Name	Courtney Culverhouse
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Sustainable Transport and Connectivity - Electric car charging points to be mandatory for all new developments. Cycle paths to town centres and rail stations (with secure bike storage) also to be mandatory for all developments. Public transport to be greatly improved and electric vehicles to be used.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14072
Person ID	1270477
Full Name	JOHN KILPATRICK
Organisation Details	HARDINGS WOOD TRUST
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Sustainable Transport and Connectivity comment	<p>with the following 2 exceptions;</p> <ol style="list-style-type: none"> 1 Policy DM53 Walking and Cycling (page 167); paths close to wildlife corridors, hedgerows etc; There should be no lighting at all in these situations. 2. Policy DM50 Transport and Movement (page 163); I cannot see that making the canal towpath a cycleway is in any way a practical proposition. The towpath is already used by many walkers and in almost its entirety it is not wide enough for both forms of exercise. I feel it would lead to confrontation
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14161
Person ID	1163439
Full Name	Lindy Weinreb
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Sustainable Transport and Connectivity comment	<p>Public Transport – in General</p> <p>What an operator would like, and many passengers.</p> <p>A service that goes directly from your origin to destination, with minimum stops, very fast, maximum loading.</p> <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.</p> <p>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 planners 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.</p> <p>Buses have a different problem. When I layout housing estates, I 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.</p> <p>So, I need to design new housing estates with a road layout which encourages bus, tram and train use.</p>

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 I have to consider a number of factors, many of them are determined by transport.

- A large proportion of households have two adults working. If they are working, they need to get to work.
- If the house is for a family with children, in most cases they will need to get to school. Often they will be at the same school, but not always.
- The size and cost of house can affect the type of transport 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 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.

Wider context

This paper focuses mainly on the transport need of housing for sale, not rent. However, many of the issues apply to social housing as well as private housing. However, the choices facing people who cannot afford a car, can be different. They are forced to use public transport. But their need for good public transport are often greater.

Everyone's quality of life is determined by the income they can obtain, less the cost of housing and the cost of travel between housing and work.
 If you are on a low income, dependent on social housing, but your social housing is too far from your work, you will probably end up on benefits. Or you will spend so much of your time and money travelling to and from work, so as to destroy your quality of life.

Included files

Title Sustainable Transport and Connectivity

ID EGS14190

Person ID 1253654

Full Name Jodie Bell

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment In assessing all developments there needs to be consideration given to the impact of traffic on schools and existing residential areas. If the construction or the finished development will cause significant congestion in the area of a school, it should not be approved.

Included files

Title Sustainable Transport and Connectivity

ID EGS14258

Person ID 1152075

Full Name Rob Wakely

Organisation Details

Agent D

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations.</p> <p>All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points.</p> <p>Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14284
Person ID	1270629
Full Name	Rob Bray
Organisation Details	Head of Sponsorship & Fundraising Tring Rugby Club
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	(21) 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.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS14292
Person ID	1270631
Full Name	SIMON LEGG
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The plans seems to be contrary to previous objectives of reducing travel and emissions. The development in Northchurch, does not adequately provide sustainable methods of public transport travel. It is far from the train station and located at the top of the valley making it difficult for people to walk. All this plan is doing, is increasing road traffic in the local area.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14371
Person ID	1270640
Full Name	Geoffrey Llewellyn
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	The Plan accepts that Berkhamsted is congested, while going on to propose developments 3-4 km for the town itself. There is no transport policy now and none is discussed as a solution to the existing problems.

The consequences of the traffic measures envisaged for Hemel Hempstead are not considered but I have raised my concerns earlier. This whole section is a laugh – or it would be if it were not so serious.
More detailed comments are made in the BRAG document and I agree with everything they say.

Included files

Title Sustainable Transport and Connectivity

ID EGS14485

Person ID 1270672

Full Name ICP Asset Management Ltd

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Sustainable Transport and Connectivity comment Policy DM52 – Movement and access. Under Bullet 2, recognition should also be given to schemes which would enhance the sustainability of existing uses and facilities by increasing a critical development mass in a location which would make it more attractive to sustainable transport methods. For example, by increasing a resident and/or workforce population in an area with a smaller existing population could make it viable to introduce a bus route where it once was not, thus improving the sustainability of that area as a whole.

Included files

Title Sustainable Transport and Connectivity

ID EGS14528

Person ID 1270690

Full Name Akzo Nobel CIF Nominees Ltd

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	In respect to parking standards for residential development, our client welcomes Policy DM55 (part 3) which confirms the Council will consider proposals that deviate from adopted parking standards in areas of particular parking stress, such as Berkhamsted High Street, thus allowing greater flexibility to be applied to parking standards to help encourage new development.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14561
Person ID	1270698
Full Name	Ms Elizabeth Hamilton
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>This chapter contains numerous policies which will be entirely unachievable in the context of the proposed housing growth figures and in particular the proposal for the majority of the larger housing allocations to be located on the furthest edges of the existing settlements, especially in the case of Berkhamsted and Hemel Hempstead. In Tring, the massive growth area is closer to the railway station but the traffic consequences will undoubtedly cause totally unacceptable congestion in the narrow high street with its already extremely busy central cross roads at the junction with Akeman Street.</p> <p>Paragraph 21.3 states that 'we need to plan for a low-carbon and less car-dominated future'. Paragraph 21.4 states that a 'key part of our strategy is to locate development in areas which are or can be made sustainable by encouraging a mix of uses within a development, limiting the need to travel, wherever possible, and offering a genuine choice with the priority being on walking, cycling and passenger transport'. The plans as currently formulated make the achievement of these objectives highly unlikely.</p>

Paragraph 2 a. of Policy DM50: 'Locate development in areas that provide good levels of access to sustainable modes of transport and can make provision for its improvement', and the whole of Policy DM53 – Walking and Cycling, appears to be particularly unrealistic in the case of the housing allocations in Berkhamsted, especially those on hilltop locations to the south and west of the town centre. The steepness of the terrain and distance from the town centre and railway station, in some cases in excess of two miles, makes adoption of walking and cycling modes of travel highly unlikely. It is therefore likely that the already extremely congested town centre, where traffic is gridlocked especially during the school run and rush hour periods, will become even more congested, adding to air pollution, noise and inconvenience for all residents.

The situation with the Hemel Garden Communities proposal would be even worse. The most northerly part of the proposed area would be approximately four miles from Hemel Hempstead railway station and uphill from the centre, although the terrain is less steep than in the Berkhamsted valley. As well as making the adoption of walking and cycling modes highly unlikely for accessing the town centre and railway station transport hub, those wishing to access London-bound rail services could instead choose to drive to Berkhamsted station, which is only marginally further away, or drive to Harpenden or St Albans to access the Thameslink service direct to the City.

Included files

Title Sustainable Transport and Connectivity

ID EGS14595

Person ID 1270707

Full Name Ms Debbie Wilson

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Sustainable Transport and Connectivity comment 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.

Included files

Title	Sustainable Transport and Connectivity
ID	EGS14613
Person ID	1270715
Full Name	Sunil Tandon
Organisation Details	The Park Garage Group PLC
Agent D	1264313
Agent Name	James Hodgkins
Agent Organisation	Simply Planning Ltd
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<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>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14665
Person ID	860814
Full Name	Mrs Clare Joyce
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Sustainable Transport and Connectivity comment	21. Sustainable Transport and Connectivity. 21.15 It is unrealistic to expect a switch from cars to "bus, cycle and pedestrian transport".
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14763
Person ID	1207558
Full Name	Ms Jane Barnett
Organisation Details	Director Savills (on behalf of Taylor Wimpey)
Agent D	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
Sustainable Transport and Connectivity comment	<p><i>Major development along these corridors will be expected to contribute towards the delivery of interventions identified in the Sustainable Transport Strategies, where appropriate and justified in accordance with CIL Regulation 122. beyond those necessary to make a scheme compliant. Similarly, if a scheme is capable of contributing to the improving of pedestrian movements across the town through enhanced on-site connections this should also be explored as part of the planning application process and should be developed in alignment with Policy DM52 - Movement and Access and Policy DM53 - Walking and Cycling again where such measures are CIL Regulation 122 compliant.</i></p> <p>The importance of delivering transport improvements as well as an enhanced travel choice alongside strategic developments is recognised. Those identified within the site specific allocation have informed the concept masterplanning work to assist in demonstrating the deliverability of the site and to support its allocation as part of the South Berkhamsted Urban Extension. This policy identifies the potential for contributions towards additional transport interventions. 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 current wording of this Policy would not satisfy those tests with any such</p>

contributions needing to be tested at future stages and based on technical impact. The proposed amendments are therefore necessary to ensure consistency with the NPPF and in satisfying the tests of soundness.

Included files

Title Sustainable Transport and Connectivity

ID EGS14808

Person ID 1264510

Full Name Martin Evening

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment The Dacorum DLP states that it seeks to reduce the number of car journeys and increase the use of sustainable transport, but it does not make it clear how this might be achieved other than by attrition and road congestion. We live in (address removed) in Berkhamsted, where the current provision of the Rail Service is already operating near to maximum capacity. There is no expansion of bus transport or new train services proposed in this DLP. How can car commuting be reduced if there are no transport alternatives available? How is Dacorum going to encourage commuters to give up their cars? How does Dacorum BC expect to achieve reduced car usage? There are no details. I also see there are no significant proposals for improvements to road or traffic flow and no proposals have been made to improve walking/cycling/public transport routes and also, there is no significant improvements to public open spaces.

Included files

Title Sustainable Transport and Connectivity

ID EGS14849

Person ID 1270808

Full Name Westmorland Limited

Organisation Details Westmorland Ltd

Agent D 1270759

Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> • Along with national policy as set out in the NPPF (referenced above) the Strategy Document also makes reference to the recent Planning White Paper. The document identifies some steps have been included to reflect some of the proposals including: <ul style="list-style-type: none"> • Introducing the simplified zoning categories; and • Strengthening local design policies and guidance <p>There has been no further detail following the Planning White Paper consultation and, at present, the approach reflecting certain aspects of this (as set out above) is appropriate and is supported.</p> <p>In terms of national policy on truckstops, the NPPF is clear that <i>“Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking locations that lack proper facilities or could cause a nuisance (paragraph 107)”</i>.</p> <p>The provision of truckstops is also addressed by the Department of Transport Circular 02/13 The Strategic Road Network and the Delivery of Sustainable Development which sets out the national policy context for roadside facilities. It is clear that the primary function of roadside facilities is to support the safety and welfare of the road user, which maintains the effectiveness and efficiency of the strategic road. Truckstops provide an important road safety function and allow HGV drivers to take statutory breaks. The Circular also specifies the mandatory parking provision for different types of roadside facilities, including truckstops. This is discussed further at Section 6.</p> <p>The Hertfordshire Local Transport Plan also recognises the need to manage freight and logistics (Policy 16) which includes support for improvements in HGV provision in the county, including overnight parking, in appropriate locations.</p> <p>In addition to the policy context, there is further evidence prepared by both Highways England and Hertfordshire County Council, important statutory partners responsible for the delivery of provision of infrastructure for freight, which plays a vital role in the UK economy.</p> <p>As set out within the Vision Document in Appendix 1, The Department for Transport has attempted to increase lorry parking facilities for some time. They published a National Survey for Lorry Parking in 2017, which identified the East of England (in which Dacorum is located) as one of the most critical regions in need of additional HGV parking with the majority of truckstops full and at capacity, including Watling Street Truckstop.</p> <p>Hertfordshire County Council in conjunction with Hertfordshire Local Enterprise Partnership (LEP) has also sought to overcome issues relating to HGV parking issues arising at the Maylands Business Park. They commissioned AECOM to identify transport infrastructure needs. This report identified that there are HGV parking issues, including parking on</p>

local roads, with no facilities, causing disruption to traffic It is understood, anecdotally, that policing the parking of HGVs is difficult as there is no alternative parking solution for the vehicles at present. The report goes on to say that Watling Street Truckstop is very busy and at certain times is full. Given the close proximity of the truckstop to Maylands, one of the key recommendations (A2) of the report is to consider the expansion of Watling Street Truckstop.

As highlighted above, the national and local policy context and evidence acknowledges the shortfall within the vicinity and, hence, land use policies proactively driving proposals for HGV parking are supported as further set out in these representations.

Included files

Title Sustainable Transport and Connectivity

ID EGS14855

Person ID 1270808

Full Name Westmorland Limited

Organisation Details Westmorland Ltd

Agent D 1270759

Agent Name Miss
Hanna
Mawson

Agent Organisation

Yes / No

* Yes

* No

Sustainable Transport and Connectivity comment This draft policy sets out the parking requirements for all non-residential As discussed in Section Two, Circular 02/13 sets out the mandatory parking provision for roadside facilities, including truckstops. The Watling Street Truckstop allocation will need to meet this requirement and then consider local parking requirements.

Included files

Title Sustainable Transport and Connectivity

ID EGS14892

Person ID 1144629

Full Name Mrs SOPHIE LAWRANCE

Organisation Details

Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> DM50 (Transport and Movement) states that a transport strategy will be adopted that will reduce dependency on private cars by locating "<i>development in areas that provide good levels of access to sustainable modes of transport and can make provision for its improvement</i>". Many of the sites around Berkhamsted/Northchurch, in particular those to the South West, will be inconsistent with that aim (being located 3.5-4km from the town centre and train station), and will foster increased private car use. DM51 (Supporting and protecting land for transport interventions) states that "<i>Land identified through the Sustainable Transport Strategies as important transport corridors will be protected for transport interventions and will be retained as its existing designation until such a time where the land is to come forward for development. These corridors include: [...] South-North movements to Berkhamsted Town Centre including Bell Lane, Durrants Lane, Swing Gate Lane and Woodland Avenue. [...] Major development along these corridors will be expected to contribute towards the delivery of interventions identified in the Sustainable Transport Strategies, beyond those necessary to make a scheme compliant</i>". A number of those roads are narrow/residential. In relation to Bell Lane, this statement is baffling and impossible to understand. As explained in more detail in Section 5.2, this is a single-track rural lane of some antiquity. Moreover, it does not lead to Berkhamsted Town Centre (or even to Northchurch village centre, given the one-way portion of road between Westfield Road and the High Street. It is wholly incapable of functioning as an "<i>important transport corridor</i>" as it is incapable of being widened (due to the close proximity of housing and Beech trees near the junction with Granville and Westfield Roads). DM53 (Walking and cycling) - in addition to the existing aims, thought should be given to improving cycling routes <u>within</u> towns.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS14964
Person ID	1270499
Full Name	Hertfordshire County Council Property
Organisation Details	Property Team

Agent D	1263792
Agent Name	Ms Claire Newbury
Agent Organisation	Senior Associate Vincent and Gorbng
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>Sustainable transport and connectivity</p> <p>Transport and Movement</p> <p>HCC supports the Council in delivering the objectives of Local Transport Plan 4.</p> <p>Policy DM51 lists a number of important transport corridors within the Borough that have been identified within Sustainable Transport Strategies. This includes East-West movement in to and out of Tring including London Road and Station Road. The policy goes on to state <i>“Major development along these corridors will be expected to contribute towards the delivery of interventions identified in the Sustainable Transport Strategies, beyond those necessary to make a scheme compliant”</i>.</p> <p>The transport interventions necessary to make development acceptable should normally be funded by that development and there may be cases where an element of ‘pooling’ is necessary to fund infrastructure in areas where a number of developments are proposed. However, any such contributions must still meet the guidance of the NPPF and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 such the contribution must be necessary to make the development acceptable in planning terms. The approach of securing contributions that are not required to the make the scheme ‘compliant’ clearly does not accord with this guidance. HCC therefore object to Policy DM51 as presently drafted as it is inconsistent with national policy. Contributions can only be required that are necessary to make the scheme acceptable. This comment is also relevant in relation to Policy DM54, whereby contributions from major development towards passenger transport must be based on evidence of need and meet the statutory tests for planning contributions.</p> <p>Parking</p> <ul style="list-style-type: none"> As a general point, for consistency, the Local Plan policies in respect to parking provision should accord with the recently revised parking standards SPD.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15016
Person ID	1270845

Full Name	DOMINIC LAWRANCE
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Comments on policy DM50 (“Transport and Movement”)</p> <p>Policy DM50 states that a transport strategy will be adopted that will reduce dependency on private cars. This is to be achieved, per DM50, by locating “<i>development in areas that provide good levels of access to sustainable modes of transport and can make provision for its improvement.</i>”</p> <p>Again, these are fine words, which don’t match up with the site proposals. Some of the proposed Berkhamsted / Northchurch sites are 3km or even 4km from the rail station, and in positions where other public transport is very unlikely to be viable.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15017
Person ID	1270845
Full Name	DOMINIC LAWRANCE
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Sustainable Transport and Connectivity comment	Comments on policy DM51 (“Supporting and protecting land for transport interventions”) Policy DM51 states that: <i>“Land identified through the Sustainable Transport Strategies as important transport corridors will be protected for transport interventions and will be retained as its existing designation until such a time where the land is to come forward for development. These corridors include: [...] South-North movements to Berkhamsted Town Centre including Bell Lane, Durrants Lane, Swing Gate Lane and Woodland Avenue. [...] Major development along these corridors will be expected to contribute towards the delivery of interventions identified in the Sustainable Transport Strategies, beyond those necessary to make a scheme compliant ...”.</i> This proposed policy is very obscure, possibly deliberately so, and should be re-written in plain English. What is meant by “the delivery of interventions”?[1] [1] The NPPF requires policies within development plans to be clearly written and unambiguous. See footnote 13 above.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15045
Person ID	1250021
Full Name	Hallam Land Management Ltd
Organisation Details	Hallam Land Management Ltd
Agent D	1265070
Agent Name	Stacey Rawlings
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	Draft Policy DM51 – supporting and protecting land for transport interventions includes the need to safeguard land within the North Hemel Growth Area for a new northern distributor road – subsection a and other general requirements for Hemel Hempstead in subsections b-d.

The relevant evidence base is the Hemel Hempstead Sustainable Transport Strategy. This has not been made available for review as part of the consultation. It should be released **immediately**, and the relevant sections of the plan issued for further consultation stage prior to any regulation 19 consultation in order to be effective consultation.

This also applies to draft **Policy DM53** – Walking and Cycling and **DM54** – Passenger Transport.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15063
Person ID	1270849
Full Name	Ms Jessica Lindfield
Organisation Details	St William Homes LLP
Agent D	210999
Agent Name	Mr Martin Friend
Agent Organisation	Director Vincent & Gorbing
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p>SUSTAINABLE TRANSPORT AND CONNECTIVITY</p> <p>Transport and Movement</p> <p>St William support Policy DM50 – Transport and Movement, with emphasis on the importance of locating development in areas that provide good levels of access to public transport. St William suggest that Policy DM50 should be amended to refer to the role of parking provision as part of the approach to managing car use and the success of initiatives such as car clubs.</p> <p>Policy DM51 sets out the infrastructure improvements required to deliver the plan. Whilst this is useful, the policy states that <i>“Major development along these corridors will be expected to contribute towards the delivery of interventions identified in the Sustainable Transport Strategies, <u>beyond those necessary to make a scheme compliant.</u>”</i> (our underlining).</p> <p>Clearly, the transport interventions necessary to make development acceptable should normally be funded by that development and there may be cases where an element of ‘pooling’ is necessary to fund infrastructure in areas where a number of developments are proposed. However, any such contributions must still meet the guidance of the NPPF and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 such the contribution must be necessary</p>

to make the development acceptable in planning This policy of securing contributions that are not required to the make the scheme 'compliant' clearly does not accord with this advice. St William therefore object to Policy DM51 as presently drafted as it is inconsistent with national policy. Contributions can only be required that are necessary to make the scheme acceptable.

This is particularly fundamental to the delivery of the National Grid site that is already challenging in terms of viability due to the significant abnormalities associated with making the site suitable for development.

Movement and Access, Walking and Cycling and Public Transport

St William welcome the emphasis on minimising the need to travel by car and the general approach of Policy DM52 – Movement and Access. The policy notes that based on evidence, financial contributions will be sought for highways or sustainable transport measures that cannot be met on site but that these measures should be “necessary to mitigate the impacts of the development.”

This approach is supported but appears inconsistent with Policy DM51 above and Policy DM54 – Passenger Transport. The latter policy states that

“Major Development will be required to contribute towards service improvements so that the frequency and availability to travel to key destinations is enhanced and more attractive to users subject to viability and the existing bus network in the vicinity of the site.”

As with Policy DM52, the policy should recognise the necessity test in national guidance and state that *“If evidence demonstrates that there is a need to improve public transport services, Major Development will be expected to contribute to.....”*

Parking Provision

St William consider that the approach to parking provision embodied in Policy DM55. should better reflect the recently published The policy indicates in clause (1) that all residential development will be required to provide parking in accordance with the adopted standards in the DPD. However, clause 3 accepts that there are times when deviation from the standards may be acceptable.

The recently adopted standards are as described – they are a standard or requirement that must usually be met, rather than a maximum. The high accessibility zone in Hemel Hempstead (including the National Grid site) is recognised with a lower requirement applicable (but still a standard to be met). However, the SPD does state that :-

“departures from these [standards] will only be accepted in exceptional cases, when appropriate evidence is provided by the agent/developer for consideration by the Council, and the Council agrees with this assessment.” (Parking Standards Supplementary Planning Document, para. 6.1)

Consequently, clause 1 should be amended to read that *“All residential development will normally be required to provide parking in accordance with the standards.”*

St William consider that the National Grid site is a clear candidate for a reduced level of parking given the proximity of the site to the transport interchange at the railway station, the town centre within walking distance and the fact that the

surrounding streets are already the subject of a controlled parking zones such that ‘over spill’ parking would not be possible. The policy should be clear that in such circumstances a reduction in the standard may be appropriate.

Moreover, the level of parking is a crucial issue in the design process and ultimate quality of new places. Where a reduced level of parking is possible such as at the National Grid site this can have significant benefits to the overall quality of the development. Fundamentally, it will allow for the optimisation of the site whilst creating pleasant external spaces that prioritise pedestrian enjoyment and movement. Indeed, an appropriate level of parking can ensure that where parking is provided it is more easily integrated into the design to minimise its impact on public spaces. It is suggested that Policy DM55 specifically recognises this issue with additional wording as follows :-

“Deviation from adopted parking standards will also be considered as part of a design-led approach to new development in sustainable locations where a reduction in parking can be justified in relation to site optimisation and place-making.”

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15075
Person ID	1158050
Full Name	Mark Behrendt
Organisation Details	Planning Manager – Local Plans Home Builders Federation
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p><i>Parking standards</i></p> <p>1 The policy states that the Council will require compliance adopted standards for car and cycle However, it must be noted that these standards are not set out in the local plan but in supplementary guidance. We are concerned that such standards, which are issues of policy as the can be used to refuse an application if they are not me, being set out in guidance and not the plan itself. Legislation is clear that policy issues must be set out in local plans. This is to ensure that should these standards change then appropriate consultation and public scrutiny of these changes</p>

is undertaken. Two options are open to the Council, they can either include the standards as an appendix in the local plan or state in policy that development will need to have regard to the standards.

Included files

Title Sustainable Transport and Connectivity

ID EGS15076

Person ID 1158050

Full Name Mark Behrendt

Organisation Details Planning Manager – Local Plans
Home Builders Federation

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment *Electric vehicle charging points.*

1 This policy introduces requirements for electric vehicle charging points to be provided on all development. The HBF supports the use of electric and hybrid vehicles and the introduction of the necessary supporting infrastructure via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. It is the industry's preference for a national approach to the provision of charging points rather than local authorities setting their own standards. We consider this is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their

programmes to equip the labour force to meet these new requirements. It is fundamentally inefficient to create a plurality of standards.

- 1 The Government has recognised in recent consultations the possible impact of any requirement to provide electric vehicle charging points on housing supply, where the requirements are not technically The same consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site- specific conditions in relation to the local grid. The introduction of Electric Vehicle Charging Points (EVCP) in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment.

- 1 Where such costs are high the Government are proposing that any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In instances where the additional costs are likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be

- 1 As such we would suggest that the requirement for EVCPs should not be included in the local plan because the Government's proposed changes to Building Regulations will provide a more effective framework for the delivery of charging points for electric

Included files

Title Sustainable Transport and Connectivity

ID EGS15086

Person ID 1261425

Full Name Camilla Pascucci

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment	<p>The Dacorum DLP states that it seeks to reduce the number of car journeys and increase the use of sustainable transport, but it does not make it clear how this might be achieved other than by attrition and road congestion.</p> <p>We live in (address removed) in Berkhamsted, where the current provision of the Rail Service is already operating near to maximum capacity. There is no expansion of bus transport or new train services proposed in this DLP. How can car commuting be reduced if there are no transport alternatives available? How is Dacorum going to encourage commuters to give up their cars? How does Dacorum BC expect to achieve reduced car usage? There are no details.</p> <p>I also see there are no significant proposals for improvements to road or traffic flow and no proposals have been made to improve walking/cycling/public transport routes and also, there is no significant improvements to public open spaces.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15119
Person ID	1222814
Full Name	Alex MacGregor
Organisation Details	Senior Planner Quod Ltd (ON BEHALF OF PIGEON INV MAN LTD)
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Policy DM51 (part 2) states:</p> <p><i>“Major development along these corridors [identified in Part 1 of the policy] will be expected to contribute towards the delivery of interventions identified in the Sustainable Transport Strategies, beyond those necessary to make a scheme compliant. Similarly, if a scheme is capable of improving pedestrian movements across the town this should also be explored as part of the planning application process.”</i></p> <p>However, the planning obligation statutory tests set out in paragraph 56 of the NPPF (and in regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended)) state:</p>

“Planning obligations must only be sought where they meet all of the following tests:

- 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”*

Therefore, the requirement by Policy DM51 (part 2) to deliver interventions beyond those necessary to make a scheme compliant does not appear to conform to the statutory tests for planning obligations. The tests are clear that obligations should be necessary to make the development acceptable in planning terms and should be fairly and reasonably related in scale and kind to the development. Pigeon Hemel Hempstead Ltd wishes to play its full part in the delivery of the vision for HGC but this policy approach needs to be adjusted to ensure that development contributes appropriately and proportionately to the interventions that are necessary to make the development acceptable.

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15166
Person ID	1270925
Full Name	Mrs Kathryn Salway
Organisation Details	Extinction Rebellion Dacorum
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Sustainable Transport and Connectivity</p> <p>All residential developments of 15 units and above must be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations.</p> <p>All residential developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points.</p>

Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.

Included files

Title Sustainable Transport and Connectivity

ID EGS15211

Person ID 1264623

Full Name Judy Chaussalet

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment Sustainable Transport and Connectivity: All residential developments of 15 units and above should be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations. All residential developments of 30 units and above must create safe cycling routes and should be required to install publicly accessible bikes and electric vehicle fast charge points. Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.

Included files

Title Sustainable Transport and Connectivity

ID EGS15212

Person ID 1271003

Full Name Thierry Chaussalet

Organisation Details

Agent D

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<u>Sustainable Transport and Connectivity</u> : All residential developments of 15 units and above should be required to contribute towards the creation or improvement of electrified bus transport to the local key destinations. All residential developments of 30 units and above must create safe cycling routes and should be required to install publicly accessible bikes and electric vehicle fast charge points. Permission for larger developments must be conditional on the prior completion of the necessary infrastructure projects to keep with the pace of development and ensure sustainability for existing and new residents and businesses.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15233
Person ID	1271006
Full Name	Ms Zoe Wiggins
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity. Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.
Included files	

Title	Sustainable Transport and Connectivity
ID	EGS15293
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Sustainable Transport and Connectivity comment	<p><u>Chapter 21 : Sustainable Transport and Connectivity</u></p> <p>Whilst TCE broadly supports the policy aims of this Chapter, the following concerns exist:</p> <ul style="list-style-type: none"> • <u>(Paragraph 21.7 and 21.18)</u> Contrary to the text, no Sustainable Transport Strategy has been published for Hemel Hempstead. This is a significant omission from the evidence base and makes it difficult to fully comment on the Regulation 18 Local This needs to be rectified prior to the Reg 19 stage. • <u>(Paragraph 21.7)</u> There are a number of references in the consultation documents to the northern corridor In this paragraph (21.7) it is suggested as a vehicular route but elsewhere it is referred to as a sustainable corridor. Its exact nature and use is still to be determined (eg. through the Framework Plan process) and therefore it is considered that a general and consistent term should be used. “Multi Modal Transport Corridor” would seem appropriate. • <u>Policy DM50 Transport and Movement</u> : TCE notes that the user hierarchy in this draft policy is reproduced from LTP 4. It is considered that further detail should be provided in relation to “Other Motor Vehicle User Needs” in order to identify the benefits of car sharing. Car sharing is encouraged within LTP 4 (Pages 49 and 54). <p>We therefore suggest (e) is expanded to state “<i>Other motor vehicle user needs with encouragement given to car sharing where it replaces a car driver trip</i>”.</p> <ul style="list-style-type: none"> • <u>Policy DM51 Supporting and Protecting Land for Transport Interventions</u> : TCE support this policy in relation to the North Hemel Growth Area. However, it is considered that the reference in DM51(2) requiring contributions

'beyond those necessary to make a scheme compliant' is contrary to the advice in the NPPF and Other points to note are:

- **Policy DM51(1)(a)** : The Northern Distributer should have a consistent definition.

The A414 should be added as this is a key East-West corridor with proposals to make it more suitable for sustainable modes as referred to elsewhere within the documentation.

- **Policy DM51(2)** : It does not appear that there is a definition of "Major" Development, as referred to in DM51(2), within the Draft Local Plan. It is considered that all developments should be required to contribute towards the sustainable transport measures, provided such contributions are CIL compliant. This is then consistent with para 21.19 which refers to all developments making contributions. It is also more equitable and ensures all trip generating developments make appropriate
- **Policy DM51(3)** : It is suggested that part of the final sentence after the words "*or occupation*" are removed. There is no logic in identifying pedestrian movements over and above other sustainable measures and in any case this mode is covered in Policy

Policy DM52 Movement and Access

- **Policy DM52(2)(c)** should be modified to state "*including cumulative impacts in accordance with the tests in the NPPF, and is acceptable*":
- **Policy DM52(3)(c)** The first line does not make sense and needs re-drafting.
- **Policy DM54 Passenger Transport** : Whilst TCE supports the intent of this policy, the following text changes are sought :
 - **Para 1**: Not all road layouts will need to, or be able to, accommodate public So, it is suggested that the paragraph is amended to state "*Where a road layout is a public transport route the layout must include.....*"
 - **Para 2**: Passenger transport priority measures should only be implemented where the particular plan or scheme has been adopted. eg "adopted Bus Priority schemes", "the most up to date adopted A414 strategy", "the adopted Hemel Hempstead and Berkhamsted and Tring Sustainable Transport Studies"

- **Para 5:** As per the above comment on DM51, this should refer to all developments, not just major.
- **Policy DM55 Parking Provision - Residential :** Whilst it is acknowledged that this policy is structured around your adopted SPD, this document is very prescriptive and may make it difficult to encourage the use of more sustainable modes. This is a particular concern at the North Hemel allocation where 60% of all trips are expected to be by sustainable modes.

Transport Topic Paper

- **(paragraph 75)** TCE agree that this paragraph usefully summarises the masterplan issues surrounding the form, nature and alignment of the North Hemel Link
- TCE support the overall approach to examining options for developing the Transport Strategy within the Transport Topic Paper. TCE generally concurs with the long list of options although consider there may be others to also consider. TCE also generally concurs with the “Next Steps” set out at paragraph 9.31 and agree that a deliverable and robust set of interventions are needed that need to be derived from the long list of options available. For example, TCE does not consider that it has been determined from the work to date whether the M1 Junction 8 improvement would be needed within the Local Plan period to 2038. TCE looks forward to working with DBC and the other authorities in developing the strategy.

Included files

Title Sustainable Transport and Connectivity

ID EGS15464

Person ID 1271103

Full Name GRAHAM RITCHIE

Organisation Details FAIRFAX STRATEGIC LAND (HEMEL) LTD

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment SEE ATTACHED RESP

Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15503
Person ID	400475
Full Name	Mr Michael Demidecki
Organisation Details	
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<p>Policy DM50 “Transport and Movement” (page 163) There should be free public parking for electric vehicles everywhere in Tring as well as increased provision of charging points for electric vehicles.</p> <p>Policy DM53 “Walking and Cycling” (page 167) Marshcroft Lane which runs through the centre of TR03 and is said to be a Roman road, should be left as it is with the existing verges bounded by the present ditches and hedges. It is an important wildlife corridor and very popular walking and cycling through way.</p>
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15606
Person ID	1271748
Full Name	Ms Gosia Turczyn
Organisation Details	Wigginton Parish Clerk Wigginton Parish Council
Agent D	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	Section 21 Sustainable Transport and Connectivity (Question 2) Policy DM52 - Movement and access This policy states that "Development proposals will be expected to minimise the need to travel by car in the first instance" Three examples of achieving this are listed, including gigabit capable broadband but there is no mention at all of home working.
Included files	
Title	Sustainable Transport and Connectivity
ID	EGS15645
Person ID	1271974
Full Name	EMILY FORD
Organisation Details	SENIOR PLANNER
Agent D	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Sustainable Transport and Connectivity comment	<ul style="list-style-type: none"> We support the principle of safeguarding land for future transport We note that east-west movements through Berkhamsted along Shootersway form part of an identified important transport corridor. This is located to the north of Croudace's site at Rossway Farm, the masterplanning of which is informed by the transport strategy for Berkhamsted and will ensure that appropriate land is available for necessary upgrades to Shootersway. Whilst we support Policy DM51 in principle, we recommend the following amendment for soundness: <u>proportionately</u>

1 In all instances ~~these~~ proportionate sustainable transport measures should be delivered early on in the development to establish green travel behaviour from the outset of occupation in accordance with Policy DM53

Policy DM52 - Movement and Access / Policy DM53 - Walking and Cycling

- We support the principle of designing development to provide enhanced opportunities for walking, cycling and use of public
- Croudace are committed to, through appropriate and carefully considered design in collaboration with Hertfordshire County Council (HCC), seeking to ensure that all opportunities to promote sustainable movement through walking, cycling and access to public transport are considered from the outset in planning new

Included files

Title Sustainable Transport and Connectivity

ID EGS15652

Person ID 1271978

Full Name JOANNA HARLEY

Organisation Details

Agent D

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Sustainable Transport and Connectivity comment Amenity/Infrastructure – *reducing emissions and improving quality of life*

- 1 Ensure that all new development sites are linked safely and efficiently for cyclists and pedestrians with other areas both within and outside of the new
- 2 Provide more cycle and pedestrian entry/exit points and fewer vehicle traffic entry/exits – to promote more cycle/pedestrian ‘rat runs’ which are potentially quicker than using the car

- 1 Local public transport provision to also support the above linkages.
- 2 All new developments should include car sharing services with a minimum of two cars per 100 homes and with a minimum of two
 - 1 Provision of electric vehicle charging points for private vehicles and use of EV in neighbourhood car clubs.

Included files

22 Healthy Communities responses

Title	Healthy Communities
ID	EGS59
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Policy DM59/60/61/64/65</p> <p>22.5.Where are the locations on the strategy plan regarding the planning policies based on robust and up-to-date assessments for the needs of open space, sport and recreation facilities. 22.14 The statement reads <u>“it is essential that growth and development is supported by increased levels of healthcare provision and other community facilities and services. Although the Council does not directly deliver healthcare facilities we have a key enabling role by understanding service capacity and the need for additional facilities, and then identifying opportunities for new and improved provision through policies and allocations in the Local Plan”</u>. Does this also included lobbying for the much needed purpose built hospital that is still required to support the existing and planned populous of west Hertfordshire. 22.20 Despite the West Hertfordshire Hospital NHS Trust (WHHT) proposal just to refurbish the old hospital sites this ideology is not supported by the majority of the people in West Herts. All the refurbishment program will do is turn these already overcrowded hospital into restrictive building sites causing more stress and frustration for patients. <u>Surely the idea of building a new modern fit for purpose, logistically placed hospital, even on a green field site, would be more beneficial to the populous of West Herts.</u> Then once completed move the medical staff to the new hospital and then , if still required modernise the existing hospital sites of Watford, St Albans and Hemel. In Dacorum, Hemel Hempstead Hospital provides an urgent treatment centre and other local healthcare and outpatient facilities. 22.22 who will control the Health Impact Assessment and how often will this be done?? Will the local communities be involved?? Is there any consideration for building another level of class rooms on single story schools already in the borough of Dacorum? Are the new schools going to be built before the housing program is started so the amenities are there before hand so as to reduce the over capacity on existing local schools?? 22.41 Says <u>“All proposals for new sports facilities such as swimming pools and sports halls will be expected to be designed in accordance with Sport England’s design guidance to help ensure that</u></p>

facilities are fit for purpose and of a high quality design". Will these be publicly or privately owned? Will the usage cost be affordable?? 22.42 The idea of using facilities within schools and colleges to provide a useful contribution to the leisure requirements of the communities in which they are located is a very good idea as it would encourage local community people to not travel across the borough, probably using their cars, and to use a locally provided amenity. IS there any intention to build on local community centres this is in regards to policy **DM64** - Community Facilities-Existing community facilities will be protected, unless appropriate alternative quantity/quality of provision is made and conveniently located in relation to the lost facility; **22.58 With the** involvement of residents and businesses in the long term management and stewardship of community assets, such as open space and community facilities. How will residents be made aware that they can play an active role for residents in managing these assets, and will help deliver the social objectives of sustainable development?

Included files

Title Healthy Communities

ID EGS94

Person ID 1255447

Full Name Andrew Sparrow

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
 * Yes
 * No

Healthy Communities comment

Included files

Title Healthy Communities

ID EGS177

Person ID 1257687

Full Name Elizabeth Cullen

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>There seems to be a misplaced idea that having a sports centre makes a community healthy. Sports centres don't cater for all sports. They are generally expensive and can be inaccessible for reasons of affordability not only to traditional low income groups and families with more than one child.</p> <p>If you are thinking that sports centres and recreation grounds are ticking the box for improving mental health, please consider that the loss of history, community and sense of place arising from the destruction of historic sites (e.g site TR06) are factors in mental health deterioration.</p> <p>The playgrounds in Tring are not suitable for all age groups.</p>
Included files	
Title	Healthy Communities
ID	EGS229
Person ID	490644
Full Name	Mrs Helena Holliday
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Tring Primary Medical Care Facilities</p> <p>The plan needs to include greatly increased primary medical care facilities, with its own adequate parking, near new development (to reduce car journeys). The Rothschild doctor's surgery in Western Road is currently operating over capacity (as stated in Key Issues 20.6) and has very limited parking. The smaller New Surgery off the High Street shares the Forge carpark, which is full at busy times.</p>

Included files	
Title	Healthy Communities
ID	EGS264
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Green space and fresh air make inoportant contributions to the health of the population.
Included files	
Title	Healthy Communities
ID	EGS327
Person ID	1259852
Full Name	Imogen Wagstaff
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	I am concerned that it is not mentioned in this plan that there is another proposal currently being raised regarding selling off Berkhamsted football grounds for housing, moving thi ground out of the central accessible area for the community, detracting from the health of the community. I am concerned about this happening and that there are additional plans

for development which are not included in this local plan which will negatively impact on the health and wellbeing of the local community.

Included files

Title Healthy Communities

ID EGS379

Person ID 1260058

Full Name Redbourn Parish Council

Organisation Details

Agent ID 1260042

Agent Name David Mitchell

Agent Organisation Redbourn Parish Council

Yes / No No

* Yes

* No

Healthy Communities comment

Included files

Title Healthy Communities

ID EGS464

Person ID 1258240

Full Name Adele Giles

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment	<p>Making provision for sports centres doesn't mean facilities that are accessible by all. It means providing facilities that are going to be out of many people's budget. More, well designed outdoor play areas are required for young people. Maintaining good physical and mental health can be maintained by not destroying the integral, natural and historic character of a town.</p> <p>Where does the proposed and much needed hospital (especially with increased population) fit into these plans?</p>
Included files	
Title	Healthy Communities
ID	EGS478
Person ID	1269324
Full Name	Mr Philip Taylor
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	The green space is a vital health resource. For older less mobile people a real life line.
Included files	
Title	Healthy Communities
ID	EGS609
Person ID	1261122
Full Name	Mark Slade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS636
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	<p>Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.</p> <p>My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.</p> <p>The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.</p> <p>Tring is a commuter town and a (significant) proportion of new inhabitants will likely commute to London on a trainline already at capacity. Station car parks are full before rush hour is over - where is the proposal to increase that capacity? You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by</p>

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 Healthy Communities

ID EGS719

Person ID 1261251

Full Name Lesley Ashden

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS750
Person ID	1261250
Full Name	Christina Thompson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	with an assumed growth in population of approximately 44,000 over the panning period (16,889 households and an average of 2.6 per household), are health service plans going to be developing at the same rate?
Included files	
Title	Healthy Communities
ID	EGS756
Person ID	211245
Full Name	Ms Jody Conibear
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Healthy Communities comment	<p>Wellbeing in this area, despite the pretty charts, will fall - less green space, more congestion, less biodiversity, continued council cuts and lack of investment due to the debt burden that this country is carrying.</p> <p>Doctors and health services have been cut massively since the 90's in this area - hospitals have been closed, doctors cannot be contacted, waiting lists everywhere. This has been recently worsened by COVID but the problem already existed and I cannot see where in this plan the vast numbers of new inhabitants will be properly supported by adequate services.</p>
Included files	
Title	Healthy Communities
ID	EGS1170
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Healthy Communities comment	<p>Safeguarding and improving open space, play areas and sports facilities is very important.</p> <p>I should like to see DBC putting Policy DM63 into force in Bovingdon, where it has long been acknowledged (in DBC reports) that there is insufficient open space. There are only 2 small children's play areas and a small playing field (King George V) tucked away and shared with the primary school. The local Scout group has lost its building, due to it being deemed unsafe for use. I should like to see DBC working with HCC & the parish council to improve community facilities in Bovingdon, with financial investment in a new hall for the use of the scouts and other groups. Allotments are also mentioned in this policy and DBC could easily provide these in Bovingdon on their land by Little Hay Golf Club.</p> <p>It is very disappointing that DBC has only 21 miles of cycle tracks across the entire borough. There is a need and opportunity to create a cycle lane/footpath from Bovingdon to Hemel Station.</p>
Included files	
Title	Healthy Communities

ID	EGS1197
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	See comment specifically on green infrastructure towards end of infrastrcuture section. Excessive development across the borough will diminish many excellent and ancient byways and close access to the AONB so a balance between development mostly on brownfiled sites will be better than the destruction of the green belt.
Included files	
Title	Healthy Communities
ID	EGS1215
Person ID	1260922
Full Name	colin Lillicrap
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	If this plan is allowed to go ahead it will seriously damage the health of the community.By building on green belt at the edges of the current town it will remove recreatinal areas, damage the ecosystem while greatly increasing emissions from road transport. The development on the valley sides and ridge tops mean motor transport will be required to reach the high street and station along roads that cannot be sensibly improved to cater for the inreased traffic. There is no indication of how Dacrum proposes to meet the legal target of net zero carbon by 2050 that has been set by the government.

Included files	
Title	Healthy Communities
ID	EGS1246
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS1282
Person ID	1145427
Full Name	Mr David Glenister
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthcare facilities have failed to increase in line with growth in the past, and there is nothing in the policies that reassures the community that this trend will be reversed. The polices DM62 starts promisingly - "The development of land currently in use for sport or leisure provision will not be permitted" – as does DM63 – "The loss of designated open space will not be permitted". Unfortunately, both those statements are immediately followed by the word "unless", which

is seemingly the magic link word that allows this plan to afford precious little protection to either land currently in use for sports/leisure facilities or open spaces in Green Belt. Haslam Field (BK03) is a sports ground owned by Berkhamsted School, which has been an important part of the Town since 1541. If the pitches are “surplus to requirements” to the school, they are clearly not to the community. DBC should not be framing policies that allow the removal of Haslam Field from Green Belt. If the sports’ field is surplus to the school’s current requirements it should be passed to BSGCA to use until it is no longer required when it would be returned to the school. Similarly, the dichotomy between losing large swathes of open space in Green Belt and a set of ‘protective’ policies is impossible to reconcile. Indeed, we have all become even more aware of the importance of our green space during the pandemic. Our green belt has afforded us space to unwind and regenerate. Research has shown that levels of green space present during childhood are associated with lower risk of a wide spectrum of psychiatric disorders later in life, such as depression, anxiety, and substance abuse. We have a responsibility to the next generation, and the protection of our green belt is essential. This plan removes areas that have become and are becoming increasingly popular walking/rambling routes and easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes. Over the pandemic residents have not flocked to the likes of Velvet Lawn to do laps of a sports’ field, but rather the immediate and wider countryside. The benefit to both mental and physical health of these spaces are immeasurable.

Included files

Title Healthy Communities

ID EGS1304

Person ID 1261957

Full Name Jeremy Johnson

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Healthy Communities comment You need to invest more in the footpath network. We already have a problem with obesity. People need fresh air but the impact of Covid-19 lockdown is destroying many of our footpaths. If you increase the number of houses the impact will get worse.

Included files

Title Healthy Communities

ID	EGS1339
Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS1347
Person ID	772477
Full Name	Mr. Roy Warren
Organisation Details	Planning Manager Sport England
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Policy DM60: Health Impact Assessment</p> <p>Policy DM60 is supported as requires HIAs to be prepared for all major development and part of a HIA would be expected to include the consideration of the opportunities for encouraging physical activity through the design of a development. It is requested that the Strategic Design Guide and the Detailed Design Guide SPDs are listed in the relevant evidence</p>

and supporting guidance as these guides will promote health and well-being, and more specifically physical activity, through the design of a development.

Policy DM61: Education

The requirement in part 3 of Policy DM61 which expects new schools to provide community access to facilities is supported as this will provide opportunities for meeting the community's sports facility needs in locations that are well located to where people live and would accord with paragraph 92(a) of the NPPF. For consistency with policy DM62 (6), the wording of part 3 of the policy should be extended to require new schools to be subject to formal community use agreements.

Paragraph 22.42: Sport and Leisure

While the positive intention of paragraph 22.42 in relation to use of school facilities by the community is welcomed, for consistency with policy DM61 (part 3), the Council should 'expect' use of new facilities by the wider community rather than 'encourage'.

Policy DM62: Sport and Leisure

Policy DM62 is broadly supported as it seeks to protect, enhance and provide for sports facilities and the approach is supported by the Council's evidence base which justifies such an approach. The policy would also accord with section 8 of the NPPF (especially paragraphs 92, 96 and 97) and Sport England's Planning for Sport Guidance and Playing Fields Policy.

However, it is requested that part 3 of the policy is reviewed as this only expects new residential development in Hemel Hempstead to contribute towards additional leisure facilities. While the Council's Leisure Facilities Strategy identifies quantitative deficiencies in leisure facility provision (e.g. swimming pool provision) in Hemel Hempstead which may explain this, in other areas of the Borough there is also a robust case for expecting residential developments to contribute towards leisure facility provision. While other parts of the Borough may not have quantitative deficiencies like Hemel Hempstead, they do have identified qualitative deficiencies. As the residents of new developments in these areas will be dependent on existing facilities for meeting their leisure facility needs, it is justified that such developments make a proportionate contribution to the refurbishment or replacement of existing leisure facilities even if such facilities do not increase the capacity of the facility.

For example, if the Berkhamsted Leisure Centre was to be replaced to address the qualitative issues identified in the Council's Leisure Facilities Strategy it would provide the capacity to meet the needs of the residents of new developments as well as the existing community. Unless such a major infrastructure project had already secured sufficient funding from other sources, it would be appropriate for new residential developments in the Berkhamsted area to make an appropriate contribution towards its delivery. Without such contributions, there could be a risk that existing facilities do not meet the needs of new developments because of inadequate funding being available to modernise or replace them. This could encourage residents to travel to more attractive facilities further away from where they live which would not be sustainable.

It is therefore requested that part 3 of the policy is amended to remove reference to Hemel Hempstead and make reference to "additional or enhanced leisure facilities provision". Paragraph 22.43 of the reasoned justification should then explain that where the Council's evidence suggests that improvements to the quality of existing leisure facilities is required to ensure that they continue to provide the capacity and quality to support growth. Specific examples (e.g. Berkhamsted Leisure Centre) could be provided to exemplify this.

Included files	
Title	Healthy Communities
ID	EGS1443
Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	As well as inadequate thought to the pressures on water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs.
Included files	
Title	Healthy Communities
ID	EGS1452

Person ID	1262084
Full Name	MISS PAULA HASTINGS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<ul style="list-style-type: none"> 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)
Included files	
Title	Healthy Communities
ID	EGS1473
Person ID	1253872
Full Name	Georgia Huelamo
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>This plan does not go far enough in assuring me, that there will be enough access for green open spaces, or safeguard heritage sites, ancient hedgrows, woodland and manage the footfall of National Trust and other Heritage sites. It doesn't assure me that the AONB sites and views are going to be protected. This worries me.</p> <p>Healthy lifestyles are synergistic with clean air, access to amenity land, access to agricultural land, green spaces, woodland.</p> <p>With the wrong numbers of housing being proposed, I disagree that this will provide a healthy and safe environment for Dacorum's communities. Just merely stating this, is not enough and needs further explanation and assurances.</p>

Included files	
Title	Healthy Communities
ID	EGS1510
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS1564
Person ID	1261809
Full Name	Pam Ferguson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	The current pandemic has highlighted the importance of green space for the well-being of people .The local plan removes large area of green space in the borough. In most instances this will not be compensated for by the small green sites within the proposed new developments.

Included files	
Title	Healthy Communities
ID	EGS1626
Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS1650
Person ID	1261232
Full Name	Mark Burrage
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Policy DM63 - Open Space Provision Polic should not include reference to excess open space setting it as standard that all major developments should increase the open space provision for all people affected by the development not just those who will occupy the development.

Targets should be set as minimums expectations and for major development it should be mandatory that all applications are refused should these standards not be met.

Included files

Title Healthy Communities

ID EGS1653

Person ID 1262325

Full Name Mr Vivian Watson

Organisation Details Trustee
Northchurch Baptist Church

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment

REF: Northchurch Baptist Church. Building requirements 2021 and beyond.

We understand that Dacorum Council is consulting on potential changes to the Local Plan and planners are giving serious consideration to releasing land within Northchurch for future development. We would therefore be extremely interested in having a discussion about the potential community and social uses planned and how Northchurch Baptist Church may play a part.

For several years the Leaders and Trustees of Northchurch Baptist Church (NBC) have been exploring ways in which they can better accommodate all the activities which are part of their regular programme. This document brings together some of the key issues for consideration by those responsible for preparing the new Local Plan 2020 – 2038. It should be said at the outset that during the current Covid restrictions, most of our regular programme is on hold. Despite this, new initiatives such as a well-stocked pantry, or food bank, have become an important feature of the church and a vital lifeline for the community.

Buildings

The church building fronting the High Street was erected in 1900 and has been extended over the years to accommodate increased demand. Church membership is now 240 and there are a further 67 people who are part of our community. The main auditorium can seat around 120 people, with a further 40 in the overflow. When we reached capacity four years ago, we moved our 10.30 morning service to Northchurch Social Centre in Bell Lane. For a number of years, at the request of the community, NBC has provided volunteer manpower to help manage and sustain the Northchurch Social

Centre. This unique alliance has brought us into even closer contact with the community. The seating capacity at the social centre is around 250 and we have had more than a few services when it was 'standing room only.' Using two different sites is far from ideal as the children have to be escorted from one site to another, during or after the family service.

In conjunction with the Social Centre Trustees, we recently engaged an architect to provide some concept plans for a new building on their site to provide greater seating capacity and space for all our activities under one roof. A Pre-App submission was made to Dacorum Borough Council. Officers were supportive in principle although issues such as parking were potential challenges. However, it was recognised that the site isn't large enough to accommodate all our activities.

Staff

We employ seven members of staff. We have a minister and assistant minister, a Children's and Families Worker, a Youth Pastor, an Operations Manager, a Church Coordinator and a part time worship team leader. They all work closely with the nine Leadership and Trustees who are all volunteers.

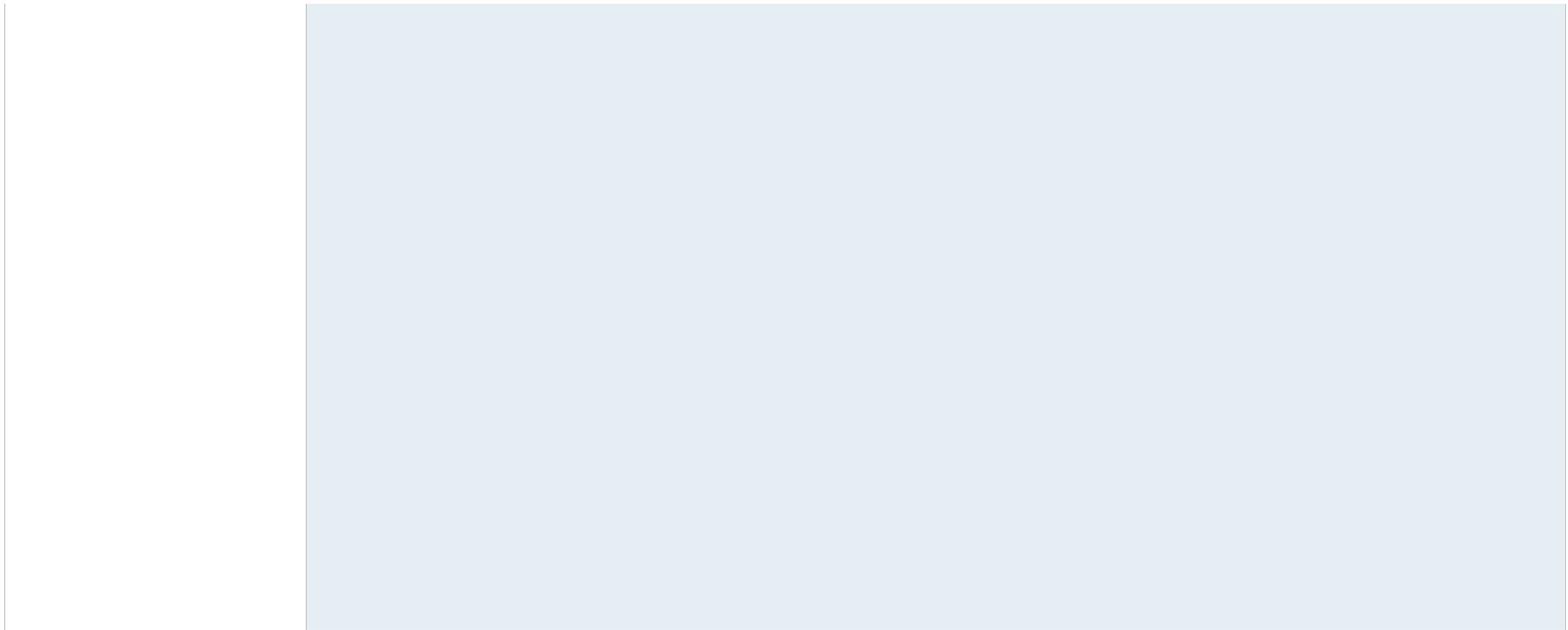
Activities

Working in partnership with Northchurch Social Centre NBC provides an excellent and vital community-based programme of activities for all ages. We have 120 children under 11 and a further 54 young people who enjoy being part of NBC life. At the other end of the spectrum, we provide a Sunday Lunch to the elderly of the community, a café where those who are on their own can find friendship and security on their doorstep. There are numerous activities taking part throughout the week, such as Life Groups which cater for those with a specific interest such as Table Tennis, Art, Book reading, or IT. We are also looking into a debt counselling service under the auspices of CAP (Christians against poverty). A visit to our website www.northchurch.com will give more information.

Future Needs

Our vision for the future is to build on the success of the local community activities and the good reputation that NBC enjoys within the area. This is particularly relevant with the proposed increase in housing which will bring greater social needs. We believe that the model for a community facility in the form of a multi-functional hall and ancillary rooms with close ties to a place of worship is one that could be replicated in the enlargement of our town.

In consideration of the above, we submit a request that a small part of one of the development sites should include such facilities. The Site Bk06 East of Darrs Lane is perhaps the most obvious but also Bk07 Lock Field, Bk11 Billet Lane and Bk13 Gossoms End, all fall within our 'parish.' We would welcome further discussion of these issues in due course and are pleased to answer any questions you may have.



Included files	
Title	Healthy Communities
ID	EGS1660
Person ID	1262332
Full Name	Keith Pollard
Organisation Details	Chair of Trustees Berkhamsted Raiders
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment

The charity Berkhamsted Raiders CFC provides sport for around 1,200 boys and girls from U7 to U18 and operates sections for Senior, Veterans, Ladies, Disability and Walking Football and futsal (a small sided indoor format). Our membership is concentrated on families who live within the HP4 postcode. We currently have a waiting list of around 100 for boys' football. In line with FA strategy, we wish to double the number of girls playing football from the current 250 to 500. The current shortage of facilities in Dacorum.. in quantity and quality

Recent studies including the Dacorum Local Football Facilities Plan, the Dacorum Playing Pitch Strategy & Action Plan, the Dacorum Sport and Physical Activity Strategy, the Dacorum Leisure Facilities Strategy, and the Dacorum Physical Activity and Sport Strategy have highlighted the current shortage and poor quality of outdoor facilities for football (grass pitches and 3G artificial grass pitches) and the lack of indoor facilities for futsal. For our 94 youth teams, we currently have access to 27 grass pitches. Based on FA guidelines for pitch usage, we need access to 40 plus pitches to avoid overuse and excessive wear. Many of our pitches are of poor quality which is exacerbated by overuse. In the 2019/20 season, 30% of scheduled games were cancelled due to the impact of overuse and bad weather on poor quality pitches. BerkoAstro, the 3G pitch operated jointly by Raiders and Ashlyns School and established in 2010 has been at full capacity since it opened. It has not been able to accommodate the growth in both youth football and social football for adults. An additional 3G pitch is an urgent priority for Berkhamsted if we are to meet the demand for football activity, particularly the growth in female participation.

Future demand

Berkhamsted is already suffering from a significant lack of facilities for football and cannot accommodate current demand. Participation in the sport is restricted by the undersupply of facilities. Future demand in Berkhamsted will be driven by:

- . The increase in female participation, at youth and adult level.
- . The increase in participation in social adult football.
- . The demand that will be generated by the significant increase in housing numbers and the associated increase in population.

A coordinated plan is required to ensure that the necessary grass and 3G pitches and supporting facilities are provided to both meet current demand and cater for the significant increase in demand that will be generated through the implementation of the Local Plan.

Included files	
Title	Healthy Communities
ID	EGS1691
Person ID	1165136
Full Name	Mr & Mrs J.D Battye
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Healthcare.</p> <p>The plan claims that there will be engagement with the deliverers of infrastructure and yet one of the most important providers (WHHT) intends to flout the principal of connectivity by refurbishing a crumbling acute-care hospital (WGH) located on the periphery of its catchment area instead of using the funds offered to construct a new, state-of-the-art hospital on a central site more readily accessible to all residents of W.Herts. WGH was rated as one of the worst hospitals in the East of England recently and while it is clearly not the responsibility of DBC the current QCC rating of “requires improvement” rather confounds the rosy vision painted in the plan. WHHT’s plans even include a future reduction in parking spaces for staff, patients and visitors to coincide with Borough plans for up to 18,000 new homes and predictions of a 60 % increase in over-65’s. Such intentions directly contravene NPPF 103 and the fine words at 22.17: ”The scale and range of service provision will need to be appropriate to the level of demand generated by development.” The high concentration of WHHT patients in Dacorum will ensure that the siting of upgraded hospital facilities at Watford will directly offend the laudable aims of reducing journeys and lowering emissions (v.DM 50 1a) and 2.14.)</p> <p>At GP level, many residents would dispute the claim that “healthcare facilities meet their existing needs”(22.21). In fact Int.SA B p.58 admits ”Many of the GP surgeries are recognised as operating at over capacity. “ Yet a recent planning application for 103 units for older residents on the very edge of Berkhamsted was passed without any insistence on the provision for a doctor’s surgery on site (20/02021/MFA) This development appears therefore to fail the provisions of DM 9 at 3.</p>
Included files	
Title	Healthy Communities
ID	EGS1785
Person ID	1154047
Full Name	Brendon Sparks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	<ul style="list-style-type: none"> Taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability. The proposal degrades Healthy Communities.
Included files	
Title	Healthy Communities
ID	EGS1819
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>If Haslam Fields is not needed by the school for sporting purposes then it should be gifted to the community for sporting use and not sold for housing. The land itself was previously gifted to the school for sporting use and was not to be sold for redevelopment.</p> <p>During the pandemic- the fields around Hall Park have been very busy with residents walking around the field and footpaths at the top. The sense of space and freedom is so good for the soul and should not be lost to excessive residential homes.</p>
Included files	
Title	Healthy Communities
ID	EGS1864
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	DM61 Education, CI 1, 3, 4 School space provision in Tring needs expanding. DM64 Community Facilities, support from DBC will be welcomed on local initiatives for a new Arts Centre in Tring.
Included files	
Title	Healthy Communities
ID	EGS1924
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS1941
Person ID	1262244
Full Name	Estelle Wraight
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	The doctor surgery is already at full capacity in Berkhamsted. How is it going to cope? Hemel's hospital is being more and more disused and patients are sent to Watford. How is Watfor General, already a failing hospital, going to cope with more demands?
Included files	
Title	Healthy Communities
ID	EGS2034
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	22.1 There is nothing in this plan to give confidence that the mental and physical well-being of Northchurch residents is a priority. Northchurch has an attractive built environment with access to natural spaces which should be left alone, not turned into an urban landscape with token green spaces. Grand schemes imposed on powerless communities from above are as detrimental to mental well-being as the failure to remedy existing infrastructure shortcomings.
Included files	
Title	Healthy Communities
ID	EGS2064
Person ID	1262738
Full Name	Alan Pierce

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS2139
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities. Taking away Green Belt, and woods robs the community of important health resource (this is constantly being sited in the national papers) and farm land that contributes food supply stability (let's hope the EU doesn't shut the gates and stop supply!) From a medical perspective health services are already over stretched in Berkhamsted. Cant get appointments for the doctors, impossible to park nearby which is terrible if you are feeling ill! Doctors over stretched and don't have enough time to deal with patients even when you do go. No local hospitals and no way to get to those that exist other than by car. Over development of the town will make all this worse.
Included files	
Title	Healthy Communities
ID	EGS2178

Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Again this is just pat phrases taken out of the environmental phrase book. There is nothing concrete here.
Included files	
Title	Healthy Communities
ID	EGS2206
Person ID	1262841
Full Name	Nada Ryan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Taking away Green Belt robs the community of important health resources for the community's physical, mental and social well being and also farm land that contributes to the food supply.
Included files	
Title	Healthy Communities
ID	EGS2214
Person ID	1262765

Full Name	Paul Rees
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	The plan currently being consulted on will lead to less healthy communities as the assumed large-scale housebuilding and addition of new roads will drive up carbon emissions and pollution, and reduce biodiversity. That is why the plan must be radically revamped. Dacorum must halve the number of envisaged homes and look to proactively encourage people to complete their journeys on foot, or on bikes, instead of by car. Encouraging people to get away from using cars and instead walking, running or cycling will be good for their physical and mental health. Building fewer new homes and therefore doing less damage to biodiversity will allow people to spend more time closer to nature instead of masses of new concrete. This will also be good for people's mental health. An unfortunate truth is that you can't have largescale growth as well as healthy communities.
Included files	
Title	Healthy Communities
ID	EGS2234
Person ID	1262860
Full Name	Susanne Rees
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	It is very depressing that Dacorum says it would like to promote healthy communities while at the same time it is promoting new housing at a large scale and the buiding of new roads. If Dacorum really wishes to promote healthy communities,

it must halve the envisaged number of new homes and commit to pushing traffic off roads and encouraging people to make more journeys on foot or by bike.

Included files

Title Healthy Communities

ID EGS2260

Person ID 488516

Full Name mr hugh siegle

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment

Good health is part of the Borough's vision. Whatever the outcome of this new Plan process the Borough and the other Boroughs in this part of Hertfordshire will see significant growth in population. The Council is not responsible for the provision of primary care and acute health facilities, but is aware of the shortcomings in the current provision centred on Watford. The Council should be robust in requiring a new accessible hospital to serve the growing population and reductions in the urgent care centre resited until these new facilities are available.

Policy DM 62 highlights the need for more outdoor sports fields and facilities which begs the question as to why the Haslam Field, one of Berkhamsted School's sports fields, which is also in Green Belt, has been designated for housing. The School's proposal that a replacement will be available does not contribute to an improvement or increase in facilities.

Included files

Title Healthy Communities

ID EGS2275

Person ID 1262925

Full Name Nandipha Jordan

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS2299
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>BRAG welcomes the sentiments of Policy DM59, but as paragraph 22.14 concedes <i>“the Council does not directly deliver healthcare facilities”</i>. Healthcare facilities have failed to increase in line with growth in the past, and there is nothing in the policies that reassures the community that this trend will be reversed.</p> <p>The policies DM62 starts promisingly - <i>“The development of land currently in use for sport or leisure provision will not be permitted”</i>– as does DM63 –<i>“The loss of designated open space will not be permitted”</i>.</p> <p>Unfortunately, both those statements are immediately followed by the word <i>“unless”</i>, which is seemingly the magic link word that allows this plan to afford precious little protection to either land currently in use for sports/leisure facilities or open spaces in Green Belt.</p>

Haslam Field (BK03) is a sports ground owned by Berkhamsted School, which has been an important part of the Town since 1541. Haslam Field was gifted to the school and, at a meeting with the school's Headmaster around the time of the Core Strategy inquiry, BRAG was told by the school that it was a legal condition that they could not develop the land – it was gifted to be used as sports fields.

Presumably, the school have found a legal way round these conditions, but clearly at the very least promoting the land goes directly against the spirit of the gift and the benefactors stated wishes, while BSGCA has reported that there is a shortage of pitches available to the community.

If the pitches are “*surplus to requirements*” to the school, they are clearly not to the community. DBC should not be framing policies that allow the removal of Haslam Field from Green Belt. If the sports' field is surplus to the school's current requirements it should be passed to BSGCA to use until it is no longer required when it would be returned to the school.

Similarly, the dichotomy between losing large swathes of open space in Green Belt and a set of 'protective' policies is impossible to reconcile. Indeed, we have all become even more aware of the importance of our green space during the pandemic. Our green belt has afforded us space to unwind and regenerate.

Research has shown that levels of green space present during childhood are associated with lower risk of a wide spectrum of psychiatric disorders later in life, such as depression, anxiety, and substance abuse. We have a responsibility to the next generation, and the protection of our green belt is essential.

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

Included files	
Title	Healthy Communities
ID	EGS2348
Person ID	1261830
Full Name	alistair budd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Healthy Communities comment	Again great words not reflected in some site plans . Does building next to the side of the A41 such that the prevailing winds will blow pollution straight over new homes sound like a plan to promote healthy living . It would be helpful if new homes in the borough had associated to them a pollution certificate so that homebuyers could access whether a property was suitable for their needs .
Included files	
Title	Healthy Communities
ID	EGS2391
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS2424
Person ID	1227518
Full Name	Mr John LOWRIE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS2450
Person ID	1262981
Full Name	Chris Mabley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Where there is no co-ordinated control there is scope for lack of sustainable developemnt. For example CCA decided health facilities for LA3 would best be delivered by improvements outside the new community despite the local development plan vision to the contrary.</p> <p>The overriding criticism is "don't make promises you can't keep". Healthy, inclusive and safe need precise definition or they are just words.</p>
Included files	
Title	Healthy Communities
ID	EGS2534
Person ID	1263148
Full Name	Deborah Fletcher
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Please keep those of us who want to downsize away from the schools
Included files	
Title	Healthy Communities
ID	EGS2558
Person ID	1263183
Full Name	Claire Davies
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy communities are ones that can get out and enjoy local Green Belt, and eat local produce, farmed locally.
Included files	
Title	Healthy Communities
ID	EGS2581
Person ID	1262037
Full Name	Jason Silver
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Building on green belt to this extent will take away natural vegetation and create a more urban environment not conducive to a healthy environment.
Included files	
Title	Healthy Communities
ID	EGS2611
Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	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.
Included files	
Title	Healthy Communities
ID	EGS2779
Person ID	1262722
Full Name	Colin McCready
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS2789
Person ID	1263104
Full Name	charlotte grange
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	I am concerned about the how the current tiny Hemel Hospital will cope with the proposed growth. The new Urgent Treatment Centre detailed in 22.21 will be welcome, however, this will not be enough to provide for the vast population growth that the council is trying to attract. Another problem that the growth area will create is cutting off the adjoining areas' access to countryside. It is now a well established fact that green space and access to open countryside is hugely beneficial for mental health, taking massive pressure off the NHS. To remove this by cutting so deeply into the greenbelt would be a disaster. I also have strong concerns about air quality and the huge amount of extra pollution created by these new developments. 22.28 mentions 'mitigation measures', this is vague and unpromising: what are they? The most effective mitigation measure would be to curb excessive fringe development, and instead encourage economic growth through regeneration of our neglected town centres.
Included files	
Title	Healthy Communities
ID	EGS2837
Person ID	1263350

Full Name	Francesca Ayers
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Hello there</p> <p>I wanted to register the following points with you:</p> <ul style="list-style-type: none"> - the importance of Primary Health provision: with the huge number of houses that need to be built across Dacorum it's going to be essential that people can access all the healthcare services they need; I know that you are not directly responsible for this however without sufficient provision people will not be healthy, What steps will you take to ensure that the correct primary health centres/GPs are provided? - that there are sufficient new schools built. Again - this is going to be an essential part of the healthy growth of the borough. <p>Thanks</p> <p>Francesca</p>
Included files	
Title	Healthy Communities
ID	EGS2883
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 * Yes	No

* No	
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS2911
Person ID	1263430
Full Name	Pru Murray
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>It is difficult to understand how quite so many houses enhances the health and wellbeing of the current residents - just causing worry, increased noise pollution, congestion and destruction of the countryside.</p> <p>We need to find a balance of accommodating new homes for all but not to the detriment of those who have already chosen Dacorum as a place to live.</p>
Included files	
Title	Healthy Communities
ID	EGS2935
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS3010
Person ID	1261190
Full Name	Neil Harwood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	In the 'Guiding Development Section Summary' of the Plan, the Healthy Communities sub-section states that: "The creation of healthy communities is essential in delivering our vision for Dacorum. Any growth needs to be supported by the appropriate level of community services and facilities". A key part of health and wellbeing considerations is the need to deliver adequate access to green space and nature. The idea of providing shared spaces between new communities is flawed and means that these will be over-crowded and over-utilised, threatening their condition and viability (as evidenced by the current enforced closure of Aston Clinton Park) and their contribution to health and wellbeing will not be realised. There is simply not enough space to accommodate the extent of new development proposed and the extent of green space provision that the additional population will require access to.
Included files	
Title	Healthy Communities
ID	EGS3105
Person ID	1012318
Full Name	Mrs Jane Hennell

Organisation Details	Area Planner Canal and River Trust
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Policy DM 59 Whilst the supporting text (para 22.4-5) recognises the benefits of open spaces and environments the policy appears to focus on bricks and mortar healthcare facilities. ocus and recognition is needed for other types of facilities, such as free to use open space. The plan should recognise the need to provide or enhance facilities which bring health benefits in other ways such as improving facilities which improve well-being such as improved access to green space or the promotion of social prescribing.</p> <p>Para 22.44 Mentions informal recreation yet the policy focuses on formal recreation provision such as sports pitches. New development may be required to contribute to open space or allotments. A desire to increase waterbased recreation is mentioned elsewhere in the plan but this section misses the opportunity to support or encourage such uses or require developers to provide the facilities needed to support them such as car parking and access points for launching or fishing.</p>
Included files	
Title	Healthy Communities
ID	EGS3235
Person ID	1263566
Full Name	Frances Read
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	

Included files	
Title	Healthy Communities
ID	EGS3282
Person ID	1262255
Full Name	AJ W
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>22.1, 22.5, Healthy communities require outdoor areas to unwind, DBC are removing the opportunity form people of the town to enjoy these areas. I see nowhere that is increasing outdoor sporting facilities and so we are reliant on private facilities owned by other rather than them being public land.</p> <p>22.23 onwards, where will the output of HIA relevant to specific developments be shared so that they can be scrutinised by residents of DBC?</p>
Included files	
Title	Healthy Communities
ID	EGS3386
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS3436
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>The Plan states relating to Healthy Communities/Sport and Leisure: “22.5 NPPF states Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities.”</p> <p>“22.39 - Access to opportunities to participate in physical activity and exercise is essential to delivering healthier, more active and inclusive communities. The Plan seeks to protect sport and leisure facilities including outdoor playing pitches, artificial grass pitches and athletics provision, in addition to indoor leisure facilities such as swimming pools and sports halls, in accordance with the NPPF (paragraph 97).”</p> <p>“22.40 Planning guidance requires local authorities to base policies on an up-to-date assessment of community needs... we have undertaken a technical evaluation of sport and recreation facilities across the Borough. The Playing Pitch Strategy (2019) and Leisure Facilities Strategy (2019) look in detail at existing provision, its quality, distribution, use, participation trends and sport initiatives, before considering the impact of future growth.</p> <p>This evidence has informed our planning for new provision. Population growth can have a significant impact upon existing sport and leisure facilities, putting pressure on existing resources. We will expect development to provide for the needs of new residents to ensure all sectors of the community have good access.”</p> <p>“22.43 The Council's evidence suggests there is a need for a variety of additional sports pitches across the Borough over the Plan period. ...our evidence shows that there will be pressure on waterspace in the future, particularly in Hemel Hempstead where there is currently a small shortfall in provision. The larger Growth Areas in Hemel</p>

Hempstead, Berkhamsted, and Tring provide opportunities to secure new enhanced sports provision in these towns.

Comment: DBC's most recent Playing Pitch Strategy 2019 and Leisure Facilities Strategy 2019 both indicate a need for the expansion of sporting and leisure facilities throughout the borough and especially for the most popular and space hungry sporting activities (including football, rugby, cricket, hockey, netball) just to meet existing needs. The above statements show that DBC recognises the importance of developing additional quality sporting facilities to meet current and future demand. However, we do not see this reflected in selection of sites or in the number of sites where major sporting facility development opportunities have been identified. Indeed the rejection of the Bulbourne Cross site (proposed by Thakeham in partnership with the Berkhamsted Sports grounds Charitable Association) which proposes a major new multi-sport hub for football, gymnastics, rugby and more is missing an opportunity to deliver its strategy. Therefore, more sites need to be identified and earmarked to include and deliver new sporting facilities and or to support expansion of existing facilities.

Special attention needs to be given to the development of a significant number of new sporting hubs (see our attached representation overview). Sites are needed in Hemel Garden Communities; and more urgently in Berkhamsted, Tring - ideally in TR.01 because of location of existing facilities and clubs but also proximity to centre of town - but wherever an opportunity can be identified for contiguous multi-pitch space (particularly critical for junior football in both towns).

Given the size and scope of development in Hemel there is a need for holistic and significant planning of new facilities including major indoor sports facilities. In all cases the Council is urged to work in partnership with well-run local sports clubs as they are the major and proven supplier of existing facilities and have access to external funding streams, which combined with developer contributions could lead to creation of landmark facilities and essential new provisions. We also suggest and could help with extending invitations to NGBs to consider Hemel / HGC as potential sites for projected/required new national or regional centres.

The Plan states relating to Healthy Communities/Sport and Leisure:

22.44 The Council actively seeks greater participation in formal and informal recreational and leisure activities in Dacorum. It manages directly or indirectly a number of playing pitches and sports centres across the Borough. It continues to invest in and/or support with partners, new and upgraded provision in the towns and villages, with a particular focus on improving the sports centres in Berkhamsted and Tring.

DBC needs to take this opportunity to radically improve the quality of its existing playing pitch and indoor facilities to enable greater utilisation. It also needs to significantly increase the number of playing facilities – both indoor and outdoor – across the Borough and in particular in the housing expansion areas. To do this it should extend its partnership with local community sports clubs (through DSN) and with other local sporting providers for the development – in partnership - of both new and existing facilities; especially in Tring and Berkhamsted.

While we believe sports and clubs requiring additional pitches/space/facilities and the areas where new housing will have most impact should be an obvious focus within the Local Plan, the Infrastructure Plan should also address sporting development and expansion needs right across the Borough. It should include consideration of the needs of all sports (as defined by the PPS and the Indoor Sports Assessments Study) and particularly those clubs/activities that support

parts of the community which demand a special focus (in line with DBC policies) such as older age groups (e.g. the relatively large over 65 age group in Dacorum), those in poverty and those who may be disadvantaged, discriminated or excluded.

The Plan states relating to Healthy Communities/Sport and Leisure:

“22.44 Policy DM62

- 1 **All new residential development will be expected to contribute towards additional sport and playing pitch provision.** These will be calculated using Sport England’s Playing Pitch Calculator (for outdoor sports pitches).
- 2 All new residential development in Hemel Hempstead will be expected to contribute towards additional leisure facilities provision. These will be calculated using Sport England’s Sport Facility Calculator.
- 3 Where provision, such as new sports pitches, is made on-site as part of a development, applicants should detail long term maintenance arrangements in accordance with Policy DM65 – Community Stewardship and Management.
- 4 Proposals to improve the quality, capacity and accessibility of the Borough’s existing sport and leisure provision will also be supported.

22.50 - Policy DM63 - Open Space Provision

- 1 All new residential development of 25 homes or more will be required to comply with the Council’s open space provision standard of 3.2 ha per 1000 population. Where this cannot be delivered within the development, contributions will be sought towards improving or delivering open space off-site.
- 2 In addition to open space, new developments of 25 homes or more, will be required to deliver play space of 0.25 ha per 1000 population.”

Comment: We advocate avoiding ad hoc disparate facilities such as single football pitches in the middle of individual housing developments as these are proven to be unsustainable, attract vandalism, are expensive to maintain and are unusable by organised sports clubs because of lack of support facilities and non-contiguous positioning. Developers of smaller developments should be encouraged to contribute to development of facilities off their individual site; and larger developers/developments should provide spaces suitable for sports clubs to manage and sustain, or even major sporting hubs and multi-sport facilities.

All proposed new sporting developments should be designed and planned in partnership with local community clubs and organisations that will be the users of such facilities and can provide ongoing sustainable development, maintenance, stewardship and management. Developers should be encouraged to seek out local clubs/partners to work with on such projects – partners who will make sure facilities are used and not abused.

[NB the Following supporting evidence from DBC Playing Pitch Strategy 2019 –

“HOUSING GROWTH SCENARIOS

Experience shows that only housing sites with 600 dwellings or more are likely to generate demand for new provision to be created. For large scale developments, it is likely that demand will be potentially generated for larger sports such as football and/or cricket. Consideration should be given to providing multi-pitch sites with suitable ancillary provision, including appropriate clubhouse/changing facilities and carparking. Single pitch sites which have been provided traditionally by developers are not considered to provide long term sustainable provision for pitch sports.”

DBC needs to extend its partnership with local community sports clubs (through DSN) for the partnership development and expansion of new and existing facilities - especially in Tring and Berkhamsted.

22.51 -22.57 (Community Facilities)

Comment: Local community sports clubs not only provide and maintain facilities for sporting participation by the community but also social centres where communities meet and integrate – on touchlines and in club houses. They also provide local meeting facilities for communities and businesses fulfilling the role that in the past was filled by village halls and community centres.

When meeting the need for community centres and new sports facilities are required in new developments, partnering with Sports Clubs should be considered as a potential delivery solution.

NB Re Development Policies affecting Indoor Sports Facilities – Please also see our answer to Question 26

Included files	
Title	Healthy Communities
ID	EGS3465
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	This plan removes areas of Green Belt that have become and are becoming increasingly popular walking/rambling routes and easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes. Over the pandemic residents have not flocked to the likes of Velvet Lawn to do laps of a sports' field, but rather the immediate and wider countryside. The benefit to both mental and physical health of these spaces are immeasurable.
Included files	
Title	Healthy Communities
ID	EGS3492

Person ID	1263805
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<i>For Dacorum as a whole, I am concerned that with the vast expansion of housing/population in Aylesbury Vale close to Dacorum (in Aston Clinton, Halton and Weston Turville) when combined with the increases in the West of Dacorum (HGC, Berkhamsted and Tring) there will be immense pressure on the local infrastructure in both Boroughs. I am especially concerned that there is no accompanying plan for increased hospital capacity in either Borough (indeed a downsizing is proposed for Hemel Hospital). Stoke Mandeville Hospital which services the needs for most in Tring is already stretched and we may find its services no longer available to residents of Dacorum as a result of the development around Aylesbury straining its resources. I consider therefore that additional hospital resources are a critical infrastructure priority.</i>
Included files	
Title	Healthy Communities
ID	EGS3519
Person ID	1263810
Full Name	David Tolfree
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	

Included files	
Title	Healthy Communities
ID	EGS3606
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS3615
Person ID	1263865
Full Name	Robin McMorran
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	I'm losing the will to live.

Included files	
Title	Healthy Communities
ID	EGS3734
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS3737
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	Destroying green lands and nature walks for housing and gyms doesnt make sense
Included files	

Title	Healthy Communities
ID	EGS3773
Person ID	1207786
Full Name	Anne Foster
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Destroying areas which, particularly through the pandemic, have become a life line for people as walking areas close to where they live, is detrimental to healthy communities. I have walked all the sites in recent weeks - I include a pic of BK01 - easily accessible from Hall Park/ Swing Gate area and the top of the valley.</p> <p>Does the Health Impact Assessment required by DM60 - include assessing the impact on the local community of the loss of such areas?</p> <p>Whilst green areas within the sites will undoubtedly make them more pleasant places to live, they will in no way compensate for access to the open countryside that has been lost. It's ridiculous to suggest that these small areas may replace Ashridge and the Chiltern Beechwoods as destinations. Loss of this countryside will simply mean more people heading out by car into the surrounding AONB.</p> <p>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.</p> <p>There are no proposed contributions in the IDP to address local Adult Social Care and Mental Health needs.</p>
Included files	C934496A-86EA-4AC7-AA92-6EDAB537C1E0.jpeg
Title	Healthy Communities
ID	EGS3868
Person ID	1263989
Full Name	Lauren Ashton

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS3879
Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	The town is already full with toxic air from car fumes
Included files	
Title	Healthy Communities
ID	EGS3889
Person ID	1263924
Full Name	Susan Moore
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Regenerating town centres by using existing empty premises for doctors surgeries, health centres and fitness centres frees up the countryside for leisure and fresh air.
Included files	
Title	Healthy Communities
ID	EGS3946
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability. The pandemic has reinforced how important the natural environment is to health and well being.
Included files	
Title	Healthy Communities
ID	EGS3962
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Health and wellbeing are paramount to our communities as heightened by the pandemic and ensuing lockdown. This local plan will make life worse for residents of Berkhamsted and any new residents. It will bring an increase in car journeys, congestion, pollution , poor air quality. Northchurch has had additional air quality monitoring in place for several years now because the air quality is already so poor. Out town lies along a valley, with most residential areas along the bottom and up the sides. Air pollution naturally collects therefore in the valley.</p> <p>DBC are using an outdated Air Quality Action Plan from 2014-2018. Sadly air pollution has not improved since then, and recently, significantly, air pollution has been legally listed as a cause of death.</p>
Included files	
Title	Healthy Communities
ID	EGS4015
Person ID	1263101
Full Name	Richard Hall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Fig 12. Affects</p> <p>DM62 -1 - Can there seriously be any leisure facilities that are surplus?? Really?</p> <p>DM62 -3 - Why only Hemel ?</p> <p>DM63 -1 How is surplus open space calculated?</p> <p>DM63-3 - contributions will be sought is too WEAK. MUST be paid</p>

Included files	
Title	Healthy Communities
ID	EGS4069
Person ID	1263883
Full Name	New Gospel Hall Trust
Organisation Details	New Gospel Hall Trust
Agent ID	1263872
Agent Name	John john.shephard@jjdesign.org.uk
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>New Gospel Hall Trust welcomes and supports the proposed chapter 22 and Policy DM64 dedicated to Community Facilities. The Trust notes and supports the need to protect existing community facilities subject to the proposed criteria at paragraph 1 of the policy.</p> <p>The Trust notes and supports the provisions in paragraph 2 of the policy, which may assist the Trust in its search for additional premises.</p> <p>The Trust welcomes the clear statement of support in principle for new community facilities in paragraph 3. The locational criteria at (a) are noted, but the Trust has concerns regarding the requirement at (b) for new facilities to be designed for different activities throughout the day. This is in direct conflict with the single user dedicated facilities operated by and sought by the Trust. The Trust is prepared to be flexible with the use of gospel hall car-parks for instance to benefit a nearby school or medical centre needing additional off-street parking during the working week, provided that the hall itself is protected and also the amenities of neighbouring occupiers is respected. In the light of the response to Policy SP7, the Trust is concerned that criteria (c) will need to be applied in a flexible manner, particularly as the Trust's requirements for new halls are not directly related to new housing development proposals.</p> <p>The Trust notes the provisions of paragraphs 4 and 5, which are supported in principle. However, as set out in response to Policy SP7, associated trusts in other areas have been unable to benefit from similar local plan policies due to the tests set out at Framework paragraph 56 for the use of planning obligations; namely:</p> <ol style="list-style-type: none"> 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 both Policy SP7 and paragraphs 4 and 5 of Policy DM64 are likely to be ineffective in provision of delivery of infrastructure required by a specific faith community.

The Trust has no comments in respect of paragraph 6.

The Council is aware of the Trust views on the dual or multiple use of new and existing places of worship and the Trust welcomes the retention of the caveat 'wherever possible' as agreed at the Core Strategy Examination. The ongoing flexible approach to this issue is strongly supported.

Included files

Title Healthy Communities

ID EGS4126

Person ID 1264070

Full Name Michelle Carnegie

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment ealthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability. We also walk near these fields as have most people on this side of town during lockdown. The thought of them not being there would reduce our quality oflife.

Included files

Title Healthy Communities

ID EGS4128

Person ID 1264210

Full Name Fiona Fulford

Organisation Details myself

Agent ID 1264200

Agent Name	Fiona Fulford
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>This section aspires to support open spaces which contradicts the proportion of green belt disappearing under this housing draft plan. the numbers need to be halved based on latest ONS data.</p> <p>The primary and secondary healthcare provision in Dacorum is already significantly overstretched. The additional primary provision in this plan MUST be implemented. With regard to secondary provision I beleive that we need a whole new hospital as outlined by the Herts Valley Hospital proposals (Watford hospital is not fit for use due to lack of local development potential and traffic gridlock and Hemel hospital no longer has any of the essential ward specialities to be more than a glorified primary care unit. Hemel hospital can then be closed and the site completely redeveloped (rather than the plan's proposed reduction of the footprint)</p> <p>Education provision is also already oversubscribed thus the proposed development of new schools MUST be implemented, not just the 'easy' housing development</p> <p>I support continuation of the sports pitches, parks and school playing fields. These should not be sold off. The pandemic has shown how vital people regard such areas , together with the green belt, to maintain their mental health</p>
Included files	
Title	Healthy Communities
ID	EGS4156
Person ID	1262892
Full Name	Jean Farrer
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	I fully support the One Voice Alliance submission for this section. I don't see how the reduction of the Green Belt and increasing housing to this density can possibly contribute to people's health and well-being. My despair at reading your Plan has already affected my blood pressure. The benefit of people flocking to whatever green spaces they can walk to has been obvious during the pandemic more than ever. I live near the canal at the edge of the AONB and I have seen so many people enjoying the great places in Dacorum.
Included files	
Title	Healthy Communities
ID	EGS4179
Person ID	1145844
Full Name	Dr and Mrs Melvyn Else
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS4213
Person ID	1263248
Full Name	Johnjo McDermott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes
* No

**Healthy Communities
comment**

Not enough provision

I am opposed to the development of proposed site Tr01

Whilst supporting the efforts of Dacorum to play its part in solving the national housing shortage, particularly for local young people who cannot afford houses, we strongly oppose the Dacorum local plan 2020 to 2038 as currently proposed.

The number of new homes needed:

... is based on outdated figures: the plan is based on Office of National Statistics data from 2014, the more recent predictions of 2018 more than halve the number of new homes needed in Dacorum, and even that data is from before Brexit and Covid so out of date.

... the housing target for Hertfordshire is higher than the comparable counties of Surrey and Sussex (www.lichfield.uk).

... there must be a binding commitment for affordable homes in the plan. Too often developers have been allowed to wriggle out of this commitment. Tring is not suitable for this kind of increase in population:

... there is no capacity for more footfall at the station, the car park gets full and the trains to London overcrowded (based on pre-covid numbers).

... the High Street is unsuitable, as the main throughfare from east to west Tring the High Street is narrow and overcrowded for both traffic and pedestrians at peak times. The structure of the High Street has subsided with the current levels of traffic, this will only get worse.

... under the current proposals Tring bears the brunt of new housing with more homes than other towns in Dacorum (percentage terms).

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

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

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

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

Sustainability

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

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

Summary

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

Included files

Title Healthy Communities

ID EGS4270

Person ID 1264269

Full Name Paul de Hoest

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

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

Included files

Title Healthy Communities

ID EGS4326

Person ID 1264321

Full Name David` Fox

Organisation Details	personal
Agent ID	1264318
Agent Name	David Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>This section aspires to support open spaces which contradicts the proportion of green belt disappearing under this housing draft plan. the numbers need to be halved based on latest ONS 2018 population data.</p> <p>The primary and secondary healthcare provision in Dacorum is already significantly overstretched. The additional primary provision in this plan MUST be implemented. With regard to secondary provision I believe that we need a whole new hospital as outlined by the Herts Valley Hospital proposals (Watford hospital is not fit for purpose due to lack of local development potential and existing traffic gridlock and Hemel hospital no longer has any of the essential ward specialities to be more than a glorified primary care unit). A new hospital would mean Hemel hospital can then be closed and the site completely redeveloped (rather than this plan's proposed reduction of the footprint)</p> <p>Education provision is also already oversubscribed thus the proposed development of new schools MUST be implemented, not just the 'easy' housing development.</p> <p>I support maintenance of the sports pitches, parks and school playing fields. These should not be sold off. The pandemic has shown how vital people regard such areas, together with the green belt, to maintain their mental and physical health</p>
Included files	
Title	Healthy Communities
ID	EGS4342
Person ID	1264325
Full Name	Olivia Halper
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	<p>DM64 3.a) Need to add 'residential catchment' within walking distance to 'suitable locations'– transport options isn't enough.</p> <p>DM64: Is there potential for this policy to refer to how the needs of local communities should be assessed to understand the facility provision? Spatial Vision emphasises early engagement with communities and provision of flexible/adaptable spaces to ensure they meet community needs.</p> <p>GAP: Productive landscapes and food growing.</p> <p>GAP: Meanwhile/early activation uses for new development on urban/brownfield sites.</p>
Included files	
Title	Healthy Communities
ID	EGS4386
Person ID	1261609
Full Name	DEBORAH CROOKS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS4393
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Removing Green Belt and farmland will not not help to develop healthy, sustainable communities.
Included files	
Title	Healthy Communities
ID	EGS4468
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability
Included files	
Title	Healthy Communities
ID	EGS4514
Person ID	1264374
Full Name	Belinda Hunt
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy communities are safe spaces which can cater for their residents. Wingrave and Long Marston are already under catered for regarding local services and over burdened with new housing and no extra services or infrastructure to support. Additionally, community green spaces are being lost in village in fill and in village spread.
Included files	
Title	Healthy Communities
ID	EGS4515
Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>DM59 – Following the Nation’s recent experience with Covid where the flexibility to expand and repurpose bed space was a key component of the strategy to prevent the NHS from becoming overwhelmed, I am deeply opposed to any policy that reduces the actual bed space, or the capacity to be able to expand the bed space at short notice, such as in the event of a major incident, or another pandemic.</p> <p>I am also deeply opposed to the loss of any parking facilities linked to the hospital or that would otherwise have supported its new functions. Any necessary loss must be made good again. Based on recent experience, it is very difficult and stressful to find a parking space when taking a family member to the hospital during the day and only a little easier when visiting them in the evening. On several occasions I have been unable to secure parking in the vicinity of the hospital and even now resort to being dropped off rather than parking, which can result in a double journey via home if there are no spaces available. It is also extremely unrealistic to expect many injured or sick person to be able to cope on the bus. Loss of parking will result in greater demand for ambulance services from people who would have been able to drive, but do not feel confident enough to take other forms of public transport.</p>

DM60 (1b)– The threshold of 100 units is too high for residential developments. The requirement should be applied to any development of 40 houses or more to include smaller developments in key locations. Based on my own experience, some of the smaller sites in this proposal that are close to Areas of Outstanding Natural Beauty or local view-points contribute to a view that is so tranquil and awe-inspiringly beautiful, that they undoubtedly support my mental health and that of my family and other local residents.

DM60 (3)– This statement lacks power, particularly with regards to safety. A proposed developer is not required to make a significant effort and it is unacceptable to allow an unsafe development to proceed without adequate mitigation. I suggest this is strengthened as follows “...where unavoidable negative impacts on health, wellbeing and safety are identified, *adequate* mitigation measures must be incorporated into the proposal *or the proposal will be rejected*.”

DM61 (4b)– Through deployment of staff, drop-off and pick-up provision may be improved. Therefore I recommend a small change to b) *demonstrate* safe drop-off and pick-up provision *is available*.

DM61 (4d)– After many years of working in Early Years, I know that young children learn through play and the provision of learning and play in a woodland environment (forest school) is considered a high quality play and learning opportunity . Therefore this relationship should be acknowledged. I would like to suggest a change to statement 4d as follows –“provide or retain a suitable provision of outdoor recreation space and playing fields, *which may include ‘forest school’ amenities*.”

DM62 – Agreed

DM63– I fundamentally believe this should enable the continued maintenance of farmland, grazing land, or land for horticultural activities, in addition to allotments, if it is in the public interest or to be used as a public open space amenity.

DM64 - Agreed

DM65 (2)– In its current form, this statement will discourage local stakeholders from consulting with the Council in the formative stages of a community facility. Therefore, I recommend it is slightly amended to: “Where the Council is involved in the *ongoing* stewardship or maintenance of a development, a commuted sum will be required.”

Included files	
Title	Healthy Communities
ID	EGS4534
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

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

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

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

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

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

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

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

Failure to Provide Adequate Supportive Infrastructure

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

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

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

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

Similarly, increasing the number of dwelling by over 1,800 in the Berkhamsted area will result in a considerable increase in vehicular traffic through the centre of the town – a route that is already heavily congested at peak times at the A4251

/ A416 junction and along the High Street. This is due to the historic layout of the town along a valley with steep sides meaning there are only these two roads into and through the town.

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

Impact on Green Belt and Other Designated Land

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

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

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

You are now faced with a personal choice.

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

Included files	
Title	Healthy Communities
ID	EGS4553
Person ID	1264064
Full Name	Melanie Ingram
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

Healthy Communities comment	<p>I dispute DM59 proposed by the council, specifically the following points:</p> <p>1 & 2) How will the expansion of the local population be supported by the development plans when the recent hospital proposals (redevelopment of Hemel hospital or an alternative centralised site) have been completed removed. In addition to this the local NHS clinic was closed down in 2016. This indicates the council will be reliant on Buckinghamshire council picking up a large volume of hospital cases/services to service the people of Tring following its expansion. Therefore I disagree that the council will support proposals to expand and improve health services where they have provided no evidence of doing this so far.</p> <p>DM60.2) The planned expansion around Hemel Hempstead and Berkhamstead run very close to main transport routes on the A41 and M1 and therefore air pollution needs to be registered as a negative impact and that the most affordable housing is not positioned close to these roads to reduce the health inequalities.</p>
Included files	
Title	Healthy Communities
ID	EGS4586
Person ID	1145918
Full Name	Mr Richard Tregoning
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS4730
Person ID	1264485
Full Name	Charlotte Brown
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Taking away green belt deprives the community of an important health resource and farm land that contributes to health via the food chain.
Included files	
Title	Healthy Communities
ID	EGS4733
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS4827
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	The communities envisaged are too big.
Included files	
Title	Healthy Communities
ID	EGS4885
Person ID	1264524
Full Name	Karen Kang
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	It is difficult to understand how if healthy communities are key, that we do not and will definitely not with the plans have a working hospital in the borough.
Included files	
Title	Healthy Communities
ID	EGS4995
Person ID	1264545
Full Name	Sally Mclver
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Health is very affected by Loneliness and this needs to be addressed as part of health strategies and fed into planning proposals so there are ample community assets and spaces, including allotments which are especially important and will likely become more important and more in demand as time goes on. GPs and hospitals need to be accessible within walking distance or by bus wherever possible.
Included files	
Title	Healthy Communities
ID	EGS5039
Person ID	1264557
Full Name	Natalie Crane
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS5066
Person ID	1264258
Full Name	Fintan FitzPatrick
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS5121
Person ID	1250013
Full Name	Mrs Nikki Bugden
Organisation Details	Clerk Nash Mills Parish Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>HEALTHY COMMUNITIES</p> <p><i>Accessibility of hospital facilities</i></p> <p>It would feel remiss not to re-iterate the importance of a centrally located hospital for the growth areas. We do not support the decision to retain the a main hospital in Watford, given the growth in Dacorum.</p> <p><i>Potential impacts for mental health (space and light)</i></p> <p>Paragraph 22.1 states “The health and wellbeing of our communities is crucially important to delivering long term sustainable development and placemaking. This includes physical, mental and social wellbeing.” And under paragraph</p>

22.23, it is stated that planning “*has great potential to influence health*” and key areas include open space and housing design. We have some concerns about the lack of space and light in densely developed areas and the impact on mental health, i.e. the closeness of the buildings vs. the ability to see some open space from your own home, the implications this has on light entering the home and the fact that the national standards for internal space are “optional” for local authorities to apply.

Included files	
Title	Healthy Communities
ID	EGS5132
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 * No	Yes
Healthy Communities comment	The development proposals will fundamentally reduce the quality of life in this area and no amount of mitigation will change this. Open space is best protected by not building on it and increasing the pressure elsewhere.
Included files	
Title	Healthy Communities
ID	EGS5137
Person ID	1264550
Full Name	Kevin Fielding
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Healthy Communities comment	<p>The current plan proposes to remove healthy shared spaces from the Berkhamsted Town Centre and move to an out of town location where car transport will be required.</p> <p>The current plan proposes new developments on Green Belt land beyond the current boundaries of Berkhamsted Town, This will remove the option of Green Belt exercise for many existing residents, and encourage car use by new residents to reach the facilities of Berkhamsted Town centre. This last will likely increase road use to the point where fewer existing residents will walk. All of this will actively damage the healthy lifestyles of our community, and is therefore against national policy</p>
Included files	
Title	Healthy Communities
ID	EGS5157
Person ID	1264544
Full Name	Bethan Fox
Organisation Details	Personal comment
Agent ID	1264539
Agent Name	Bethan Fox
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	My understanding is that St Albans have withdrawn their involvement in the Hemel Garden Communities strategy on legal advice that it would not be 'found sound'. This then rather brings the Hemel section of this joint strategy within this plan into question.
Included files	
Title	Healthy Communities
ID	EGS5175
Person ID	1264509
Full Name	Hannah Fox

Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>This section aspires to support open spaces which contradicts the proportion of green belt disappearing under this housing draft plan. the numbers need to be halved based on latest ONS 2018 population data.</p> <p>The primary and secondary healthcare provision in Dacorum is already significantly overstretched. The additional primary provision in this plan MUST be implemented. With regard to secondary provision, I believe that we need a whole new hospital as outlined by the Herts Valley Hospital proposals (Watford hospital is not fit for purpose due to lack of local development potential and existing traffic gridlock and Hemel hospital no longer has any of the essential ward specialities to be more than a glorified primary care unit). A new hospital would mean Hemel hospital can then be closed and the site completely redeveloped (rather than this plan's proposed reduction of the footprint)</p> <p>Education provision is also already oversubscribed thus the proposed development of new schools MUST be implemented, not just the 'easy' housing development.</p> <p>I support maintenance of the sports pitches, parks and school playing fields. These should not be sold off. The pandemic has shown how vital people regard such areas, together with the green belt, to maintain their mental and physical health.</p>
Included files	
Title	Healthy Communities
ID	EGS5230
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	<p>This section aspires to support open spaces which contradicts the proportion of green belt disappearing under this housing draft plan. the numbers need to be halved based on latest ONS 2018 population data.</p> <p>The primary and secondary healthcare provision in Dacorum is already significantly overstretched. The additional primary provision in this plan MUST be implemented. With regard to secondary provision, I believe that we need a whole new hospital as outlined by the Herts Valley Hospital proposals (Watford hospital is not fit for purpose due to lack of local development potential and existing traffic gridlock and Hemel hospital no longer has any of the essential ward specialities to be more than a glorified primary care unit). A new hospital would mean Hemel hospital can then be closed and the site completely redeveloped (rather than this plan's proposed reduction of the footprint)</p> <p>Education provision is also already oversubscribed thus the proposed development of new schools MUST be implemented, not just the 'easy' housing development.</p> <p>I support maintenance of the sports pitches, parks and school playing fields. These should not be sold off. The pandemic has shown how vital people regard such areas, together with the green belt, to maintain their mental and physical health.</p>
Included files	
Title	Healthy Communities
ID	EGS5250
Person ID	1264601
Full Name	Tania Barney
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>Taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.</p> <p>This plan removes areas that have become and are becoming increasingly popular walking/rambling routes and easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes. Alternatively, it will lead to increased car travel and over use of the Ashridge estate. Over the pandemic residents have not flocked to the likes of Velvet Lawn to do laps of a sports' field, but rather the immediate and wider countryside. The benefit to both mental and physical health of these spaces are immeasurable.</p>

On a personal level, it would be great to identify and develop a sustainable 5K route within Berkhamsted to support a local community parkrun (and ideally a local Junior parkrun too). This would reduce car/high carbon transport to surrounding towns (Hemel, St Albans, Tring and Aylesbury) every Saturday morning, while encouraging more people to adopt a healthy, active lifestyle.

Included files

Title Healthy Communities

ID EGS5268

Person ID 1175740

Full Name Berkhamsted Schools Group

Organisation Details The Berkhamsted Schools Group

Agent ID 1175743

Agent Name Kevin
Rolfe

Agent Organisation Group Director, Development & Planning
Aitchison Raffety

Yes / No
* Yes
* No

Healthy Communities comment

Healthy Communities

Policy DM62 - Sport and Leisure states that “The development of land currently in use for sport or leisure provision will not be permitted unless: B) the loss resulting from the proposed development would be replaced with equivalent or better provision in terms of quantity and quality (on site or suitably relocated)”

The BSG proposal is for the relocation of the existing non-optimum standard sports facility at Haslam Fields to a substantially enhanced offering at Haresfoot and therefore fully complies with criteria B) above. In our response to the previous Issues and Options consultation, we submitted a detailed EQA report by expert sports consultants, TGMS, setting out the limitations of the current provision and which also demonstrated the numerous benefits arising from the proposed relocation. The site area available for sport would more than double from 3.79 hectares at Haslam Field to 7.95 hectares at site Cy04. Also, importantly in qualitative terms it would be vastly superior. The previous expert report was accepted by Sport England. Further detailed reports will be produced as required once the project passes to the planning pre-application stage.

The BSG sport proposals for site Cy04 are for a use that is acceptable in the green belt now and the BSG proposal is consistent therefore with existing policy. The allocation of the land at Cy04 for the enhanced sports provision is welcomed as it consolidates policy matters specifically.

The objective of healthy communities and well-being is at the very core of what the BSG believes in and achieves. The proposal is to enhance this further by the delivery of this project. Health and Wellbeing from sport has been highlighted even more by the Covid-19 crisis. The new facility at Haresfoot will not only benefit the BSG but also the wider community and the receipt from Haslam field will facilitate the investment at Haresfoot as well as many other wider benefits to health and education and the local infrastructure.

Included files

Title Healthy Communities

ID EGS5294

Person ID 1264532

Full Name Robert Clarke

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No No
 * Yes
 * No

Healthy Communities comment

Included files

Title Healthy Communities

ID EGS5339

Person ID 1264616

Full Name Philip Daw

Organisation Details

Agent ID

Agent Name

Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS5374
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	How can the destruction of so much green belt land be in line with healthier living? certainly locally there will be less green space. Please preserve the valuable greenbelt land we have. Please.
Included files	
Title	Healthy Communities
ID	EGS5413
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Healthy Communities</p> <p>Just one comment. The NHS have decided, against a lot of local opposition, to centralise Emergency and Secondary care (The Hospital) in Watford, despite this huge predicted increase in population in Dacorum. This growth in Dacorum will contribute towards more congestion on the roads, and put more peoples lives at risk trying to get to a hospital that is located in a congested town centre.</p> <p>Dacorum should have a secondary care facility in Dacorum not Watford.</p> <p>Second comment: Healthy lives depend not only on providing green spaces and sports facilities but also on motivation and pleasure interacting with others.</p>
Included files	
Title	Healthy Communities
ID	EGS5488
Person ID	1264648
Full Name	Lydia Whelan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	Healthy lifestyles will not be encouraged by the growth of more coffee shops and take aways - we need more green parks and sports facilities that can attract residents to exercise and meet socially
Included files	
Title	Healthy Communities
ID	EGS5490
Person ID	1264647

Full Name	Richard Burnell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS5498
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	It is essential that if we are to have more housing, we have to have local facilities including a decent hospital with an A&E. This could be a hospital on land that is located near where the boroughs of Dacorum, St Albans, Three Rivers and Watford meet. However, it is unreasonable to increase the population without a local hospital.
Included files	
Title	Healthy Communities
ID	EGS5553
Person ID	1264491

Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Removing green space dos not add to healthy communities
Included files	
Title	Healthy Communities
ID	EGS5585
Person ID	1264363
Full Name	Roselyn King
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Re DM59: the A&E at Watford already struggles to cope with demand. If Hemel is to significantly expand, I think it would be a good idea to provide an extra A&E in West Herts, perhaps in St Albans as there are operating theatres in use there.</p> <p>Re DM60: I think it would be impossible to mitigate the negative impact on health which would be caused by the proposed developments in North Hemel. These developments would ruin much-loved areas and therefore negatively impact people's mental health (the proposal of these developments is already causing upset). The developments would also be detrimental to people's physical and mental health by making it far harder for many people to continue to go and exercise in their preferred location of the countryside. Access to other open spaces would not offset this, because spending time in the countryside arguably has greater benefits for mental health than spending time in parks (I certainly find that that's the case).</p>

Included files	
Title	Healthy Communities
ID	EGS5642
Person ID	1264689
Full Name	Philip Hobden
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS5683
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	There are no significant additional health services proposed in Tring or berkhamsted to cope with the increase in population from these high density developments that are proposed.

Included files	
Title	Healthy Communities
ID	EGS5704
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS5732
Person ID	1264678
Full Name	Tom A
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	

Title	Healthy Communities
ID	EGS5754
Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>The pandemic has brought into sharp focus that <i>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities.</i></p> <p>The policies which state that <i>The development of land currently in use for sport or leisure provision will not be permitted</i> and <i>The loss of designated open space will not be permitted</i> would support this, but DBC then fails on both counts by promoting houses on Haslam Field (BK03) - a sports ground gifted to Berkhamsted School for use as a sports ground - which has been an important part of the Town since 1541. There is a shortage of pitches in the town available to the community and DBC should not be removing another precious resource.</p> <p>The plan involves building over large areas of Green Belt which is hardly conducive to physical and mental wellbeing.</p> <p>Healthcare facilities serving Berkhamsted are already stretched with the merger/closure of GP facilities serving the town. They are all at a considerable distance from the proposed sites, at the bottom of the valley. Acute hospital provision is at a considerable distance from the town and is under pressure with the existing population.</p>
Included files	
Title	Healthy Communities
ID	EGS5770
Person ID	494828
Full Name	P Marshall
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>22.50 and DM63 Welcome safeguarding of open space.</p> <p>Rigorous protection desired to move higher up the scale in terms of possible over-riding by Local Plan policies.</p> <p>Paragraph 6 of DM63 states that developments of 700 homes or more require allotment/garden space. I would suggest this be strengthened so that the requirement is triggered at a lower housing density and higher area unless all households have a private garden.</p> <p>Research from wellbeing/ mental health studies during the pandemic positively recommend outside space and nature to ameliorate negative emotions which can be triggered in anyone at anytime.</p>
Included files	
Title	Healthy Communities
ID	EGS5792
Person ID	1264741
Full Name	pete
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>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</p>

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 Healthy Communities

ID EGS5845

Person ID 1263561

Full Name Alexander Bhinder

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
* Yes
* No

Healthy Communities comment Scrolling through, section 22.17 jumps out. I am dead against the WHHT and CCG's decision to invest the vast majority of any government funding, into Watford General Hospital and I FULLY support the idea of a central green field site which the organisations above, do not.
With a minimal investment in Hemel Hempstead Hospital, I feel that health provision in the area will be severely compromised and I firmly believe that many will pay the price for the decision to invest so much into a hospital that simply is not easily accessible from much of Dacorum.

Included files

Title Healthy Communities

ID EGS5888

Person ID 1264752

Full Name Chris Brown

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Health and wellbeing are paramount to our communities as heightened by the pandemic and ensuing lockdown. This local plan will make life worse for residents of Berkhamsted and any new residents. It will bring an increase in car journeys, congestion, pollution, poor air quality.</p> <p>Northchurch has had additional air quality monitoring in place for several years now because the air quality is already so poor. Out town lies along a valley, with most residential areas along the bottom and up the sides. Air pollution naturally collects therefore in the valley.</p> <p>DBC are using an outdated Air Quality Action Plan from 2014-2018. Sadly air pollution has not improved since then, and recently, significantly, air pollution has been legally listed as a cause of death.</p>
Included files	
Title	Healthy Communities
ID	EGS5892
Person ID	1264354
Full Name	Juliet Penaliggon
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>This section aspires to support open spaces which contradicts the proportion of green belt disappearing under this housing draft plan. the numbers need to be halved based on latest ONS 2018 population data.</p> <p>The primary and secondary healthcare provision in Dacorum is already significantly overstretched. The additional primary provision in this plan MUST be implemented. With regard to secondary provision, I believe that we need a whole new hospital as outlined by the Herts Valley Hospital proposals (Watford hospital is not fit for purpose due to lack of local development potential and existing traffic gridlock and Hemel hospital no longer has any of the essential ward specialities to be more than a glorified primary care unit). A new hospital would mean Hemel hospital can then be closed and the site completely redeveloped (rather than this plan's proposed reduction of the footprint)</p>

Education provision is also already oversubscribed thus the proposed development of new schools MUST be implemented, not just the 'easy' housing development.

I support maintenance of the sports pitches, parks and school playing fields. These should not be sold off. The pandemic has shown how vital people regard such areas, together with the green belt, to maintain their mental and physical health.

Included files

Title Healthy Communities

ID EGS6006

Person ID 1264750

Full Name Neil Joyce

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment

DM61 - Tring School is currently being rebuilt. I question if it will be large enough for intake from Roman Park, let alone any future expansion of the town. The current school is also in demand from children over the border in Buckinghamshire, and I believe that it should be capable of providing education to those from outside of Dacorum as it currently does. This is a reciprocal arrangement with schools in Aylesbury, and so when considering new schools the wider region needs to be taken into account, not just the town it is situated in.

DM63 - Manufactured open spaces come nowhere close to replicating the wildlife habitats that have been destroyed when development occurs.

Included files

Title Healthy Communities

ID EGS6049

Person ID 1264797

Full Name Robert Diehl

Organisation Details

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Taking away large parts of the surrounding Green Belt robs the community of important health resources and open green spaces.
Included files	
Title	Healthy Communities
ID	EGS6154
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS6206
Person ID	1264872
Full Name	Ben Penaliggon
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>This section aspires to support open spaces which contradicts the proportion of green belt disappearing under this housing draft plan. the numbers need to be halved based on latest ONS 2018 population data.</p> <p>The primary and secondary healthcare provision in Dacorum is already significantly overstretched. The additional primary provision in this plan MUST be implemented. With regard to secondary provision, I believe that we need a whole new hospital as outlined by the Herts Valley Hospital proposals (Watford hospital is not fit for purpose due to lack of local development potential and existing traffic gridlock and Hemel hospital no longer has any of the essential ward specialities to be more than a glorified primary care unit). A new hospital would mean Hemel hospital can then be closed and the site completely redeveloped (rather than this plan's proposed reduction of the footprint)</p> <p>Education provision is also already oversubscribed thus the proposed development of new schools MUST be implemented, not just the 'easy' housing development.</p> <p>I support maintenance of the sports pitches, parks and school playing fields. These should not be sold off. The pandemic has shown how vital people regard such areas, together with the green belt, to maintain their mental and physical health.</p>
Included files	
Title	Healthy Communities
ID	EGS6227
Person ID	1261819
Full Name	Alex Rathmell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	

Included files	
Title	Healthy Communities
ID	EGS6261
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS6290
Person ID	1264030
Full Name	Sean Collier
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Regarding 22.5, much of the proposed building is on Green Belt. Whilst some building on this land may be unavoidable, it should be limited to maintain open spaces for physical and mental health.

Considering Dacorum is in need of an A&E department already, and local hospitals such as Watford and Stoke Mandeville already seem overwhelmed, I am concerned as to how they will cope with the proposed population increase.

Included files

Title Healthy Communities

ID EGS6309

Person ID 1264884

Full Name Max Ansell

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment The increase in traffic on the narrow roads in Northchurch would lead to higher levels of pollution and accordingly and increase in asthma, in a narrow valley already susceptible to trapping pollution.

Included files

Title Healthy Communities

ID EGS6328

Person ID 1261257

Full Name Simon Tuff

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment	22.19DM59DM6022.2022.33Sp4section 22
Included files	
Title	Healthy Communities
ID	EGS6465
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>This is an opportunity to audit the positive value of green field settings for the community and work out how much is needed for the health of that community, before green fields are concreted for housing.</p> <p>Bourne End benefits from footpaths and byways such as Sugar Lane which have benefitted our little community hugely and attracted walkers and cyclists from further afield such as Bovingdon and Berkhamsted. There needs to be recognition of this to conserve its value going forward.</p>
Included files	
Title	Healthy Communities
ID	EGS6488
Person ID	1264936
Full Name	Jane Cracknell
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS6503
Person ID	1264916
Full Name	Kathryn Spall
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	"It is important that existing open space is protected". The green space to the south of Berkhamsted falls within this category and is protected as Green Belt land. It is not appropriate to use as housing.
Included files	
Title	Healthy Communities
ID	EGS6611
Person ID	1264908
Full Name	Henry Smart
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Healthy Communities comment	How does your plan help people's wellbeing when you plan to build houses on the green belt. Making the countryside that is at the moment accessible to residents on their doorsteps, further away from where they live?
Included files	
Title	Healthy Communities
ID	EGS6613
Person ID	1265007
Full Name	Duncan Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Taking away Green Belt (when there is non-greenbelt land available to bulid new homes) robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS6665
Person ID	1264697
Full Name	Nicholas Wood
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	No

* No	
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS6813
Person ID	1265036
Full Name	Tom Burrows
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS6851
Person ID	1261827
Full Name	Ian Brener
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	<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. Speechless</p> <p>I endorse the response from the CCG</p>
Included files	
Title	Healthy Communities
ID	EGS6864
Person ID	1263500
Full Name	Jessica Haigh
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes to food supply stability. The green belt also helps offset the Carbon created in the areas surrounding it to reduce our negative impact on the environment. By taking this away, we will only destroy the natural environment around us, and in turn, our climate.</p> <p>There is also a serious lack of public health facilities in this area currently. This is something that needs to increase alongside the developments.</p>
Included files	
Title	Healthy Communities
ID	EGS6900
Person ID	1264920
Full Name	Anna Wellings Purvis
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Herts Public Health must provide more for Dacorum. This large land release should include some funding or provision for the growing demands on healthcare. Green spaces will be reduced by this plan, and people will be put off walking by construction noise and the feeling that the area has been spoilt. Therefore Hemel Hempstead will need something by way of compensatory exercise motivation as well as more plant growth to offset the pollution that will damage health, and adequate healthcare for residents. It is nice to have a vision and to 'seek to support' but I'm not seeing the funding for it or specifics as to 'positive health impacts'. Some of these fields above the hospital were originally intended to fund the hospital's expansion, so part of the proceeds should go to that.</p> <p>Our mental health will also have suffered in the past year and yet this plan doesn't offer sports, exercise or entertainment venues but would reduce how much people get out in the parks.</p> <p>Similarly with school provision, we should be able to see where the funding for schools is coming from. Could you give some examples of how developments will help fund expansion of schools or school places, or is that to be left to Herts County Council if they can afford it?</p>
Included files	
Title	Healthy Communities
ID	EGS6923
Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	No

Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS6931
Person ID	1265063
Full Name	Richard Scott
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Within the Berkhamsted recommendations, the Council is proposing to take away Green Belt, which robs the community of an important health resource which many families use to walk, run and cycle - as part of their well being and healthy lifestyles. The proposals are inconsistent to the National Policy - open spaces in Berkhamsted will be decimated.
Included files	
Title	Healthy Communities
ID	EGS6965
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	Reducing the amount of green belt will impact physical and mental health and also reduce the amount of local farm land that contributes to local food supply sustainability.
Included files	
Title	Healthy Communities
ID	EGS6992
Person ID	1264453
Full Name	Fiona Hinton
Organisation Details	Myself
Agent ID	1264426
Agent Name	Fiona Hinton
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	Green Belt land is an integral part of healthy communities. It contributes to physical and mental wellbeing of community members, and enables a mix of rural and urban lifestyles. It is also a component of the food chain. The principle of establishing Green Belt land is that it is NOT built on. This proposal does not demonstrate an exceptional reason why it should be. For this reason, I think this Plan will make our community less healthy, not more so.
Included files	
Title	Healthy Communities
ID	EGS7000
Person ID	1265105
Full Name	Jonathan Tay
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS7134
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
Healthy Communities comment	
Included files	
Title	Healthy Communities
ID	EGS7145
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
Healthy Communities comment	Please see comments above. Proposed development in Tring is unjustifiable and unsustainable.
Included files	
Title	Healthy Communities
ID	EGS7203
Person ID	1265129
Full Name	Karen Foxwell-Moss
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	During this pandemic, it has become all too clear how needed the Green Belt land is. We have been lucky to be in beautiful surroundings, to have been able to take steps to maintain our physical and mental health while the world around us has turned on its head. Taking away our Green Belt robs us all of a vital health resource, as well as farm land that contributes to food supply stability - another issue much closer to our hearts since the recent threats to supply chains, increased restrictions and closing borders between countries.
Included files	
Title	Healthy Communities
ID	EGS7243
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Healthy Communities comment	For somewhere like Tring, Health and Wellbeing means open countryside for walking and fresh air (amongst other things of course). It does not mean overcrowding, traffic jams, pressure on the health service, etc!
Included files	
Title	Healthy Communities
ID	EGS7250
Person ID	1264956
Full Name	Caroline Heard
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS7802
Person ID	1148738
Full Name	Ian and Claire Field
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Healthy Communities comment	(22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS7872
Person ID	1265975
Full Name	Clare Smith
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	(22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS7928
Person ID	1262335
Full Name	Penelope Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Healthy Communities comment	• 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)
Included files	
Title	Healthy Communities
ID	EGS8088
Person ID	1266049
Full Name	Mike Plowman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS8102
Person ID	1266058
Full Name	Charlotte Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Healthy Communities comment	<p>4) How would this large number of people be integrated in the community? The increased need for local employment which if left unmet would cause social disintegration. This is already a serious issue in our changing world. What facilities have are you proposing to meet these problems which are surely a fundamental issue for planners?</p> <p>This enormous proposal leaves intolerable issues within the population unresolved. There have been speedy and radical changes in the last year which leave your plan unfit for purpose.</p>
Included files	
Title	Healthy Communities
ID	EGS8226
Person ID	1207978
Full Name	Alison Sexton
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>The final overview comment concerns healthcare. Whilst education provision has been mentioned, and I applaud the plans to support developments, where development is necessary, with the provision of primary schools and a secondary school, with the exception of Parkwood surgery expansion there appears to be no thought regarding the healthcare needs of the thousands of new Dacorum residents.</p>
Included files	
Title	Healthy Communities
ID	EGS8228
Person ID	1266154
Full Name	Iain Smith
Organisation Details	

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	(22): Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS8551
Person ID	211354
Full Name	Mrs Laura Sanderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Removing Green Belt areas used for recreation and walking are not conducive to health and well-being. Berkhamsted does not have a park but it does have beautiful countryside which you want to build on. You don't think countryside matters. During this last year I can assure you that many, many people think that countryside matters. It has kept many people in better mental health. It seems that this whole Plan is for pleasing developers and sating the greed of the landowners selling their land for development.</p> <p>Berkhamsted in particular already suffers a serious shortage of green spaces and outside sporting facilities. recreational provision outside paid for clubs. The Plan has nothing to offer except houses, houses, houses. Indeed, it appears to put housing before any other consideration although it acknowledges that there are already inadequacies in provision. Hemel has lots of open green space. Lucky Hemel. Why aren't you building on those? They aren't Green Belt. They are not wildlife rich.</p>
Included files	

Title	Healthy Communities
ID	EGS8577
Person ID	1266567
Full Name	CAROLINE SMALES
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	

Title	Healthy Communities
ID	EGS8658
Person ID	1248896
Full Name	Ashleigh Genco
Organisation Details	Harrow Estates plc
Agent ID	1258542
Agent Name	Samantha Ryan
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	<p>Policy DM61- Education: Harrow recognises that growth areas should make provision for new schools to be accommodated where they are necessary to meet the requirements of the development. However, the timing of delivery within a growth area is the responsibility of the Education Authority and should not be included as a policy requirement.</p> <p>Policy DM62- Open Space: Harrow agrees that new education facilities will also provide new sports facilities that could have a dual use for community provision. The company encourages further exploration of such opportunities which will maximise the potential of new sports facilities and ensure efficient use of land.</p>
Included files	
Title	Healthy Communities
ID	EGS8702
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>Other Relevant Strategies and Studies</p> <p><u>Public Health</u>. The text within paragraph 8 isn't accurate, as the Hertfordshire Health and Wellbeing Strategy is a statutory requirement for the county council. It isn't delivered by Public Health, as it is a collaborative effort across health and social care partners through the Hertfordshire Health and Wellbeing Board. It is therefore suggested that the text within this paragraph is changed as follows:</p> <p><i>"22.8 As a part of this transfer, <u>Hertfordshire's Health and Wellbeing Board</u> Herts Public Health produced the Hertfordshire's Health and Wellbeing Strategy. This sets a goal to optimise the health and wellbeing of people throughout the course of their lives, with the strategy focusing on the four major life stages: starting well, developing well, living and working well, and ageing well."</i></p> <p>The county council is in the process of updating the Health and Wellbeing Guidance that is mentioned in paragraph 22.10 and It is recommended that reference is made to the NHS's Putting Health Into Place guidance. It is therefore suggested that the text within this paragraph is changed as follows:</p>

*“22.10 To aid this integration, Herts Public Health published the Health and Wellbeing Planning Guidance to support councils. This provides recommendations and advice on how we enable developments which enhance the physical and mental health of the community.” This can be viewed on the county council’s website.⁴ *The NHS Putting Health Into Place should also be referred to.*⁵*

Health Impact Assessments (paragraph 22.29)

Lead Local Flood Authority. The proposed guidance note that will detail the process of conducting a HIA should also consider flood risk, as it does have an impact on health for those affected, particularly mental wellbeing.

Education (paragraph 22.37)

Children’s Services. It is noted that this paragraph states that: *‘the NPPF does not specifically identify new school buildings as an appropriate form of development in the Green’* It is considered that in order for the forthcoming regulation 19 consultation draft local plan to be sound, the county council considers that new education allocations are shown on the respective inset map and the wider proposals map, where these new school requirements are stated within the respective policy.

Where Green Belt boundary changes are proposed on sites that aim to deliver either primary and/or secondary education provision, the build zones that will be needed to accommodate the school building footprints, along with the associated hardstanding, should where possible be excluded from the Green This is in order to ensure the effectiveness and deliverability of the respective education allocations, as the construction of new buildings in the Green Belt is inappropriate development and is therefore contrary to the NPPF.

The county council considers that removing the building footprint and associated hardstanding from the Green Belt will ensure the education allocations are delivered alongside the housing growth within this allocation at the required period. This will also meet the requirements of NPPF paragraph 94, part (a), which gives great weight to the need to create schools through the preparation of plans, along with the expansion and alteration of existing The county council will consider submitting a soundness objection to the forthcoming regulation 19 local plan, if the respective education allocations are not shown on the proposals map and relevant inset map and where applicable, the build zones remain in the Green Belt.

The community value of school sites are considered to be important (particularly primary schools) and should where possible be centrally located within a new development.

Policy DM61: Education

Children’s Services. The county council supports a standalone policy on education and welcomes the borough council’s expectation that new development within the plan will be required to make appropriate provision for an increase in education facilities, either by expansion or through new school

However, the text within paragraph 1 is considered to be slightly misleading, as HCC’s funding strategies may require putting funding from a number of developments towards a new school, not necessarily the improvement or expansion of existing facilities.

In the light of the comments made above and regarding the need to remove school build zones from the Green Belt and specific education provision being identified on some of the growth areas, it is requested that the following text within paragraphs 1, 2 and 4 of the policy is amended:

- 1 *Development that creates a potential increase in demand for education will be required to make appropriate provision for new facilities either on- site or by making a suitable contribution towards the improvement or expansion of nearby existing facilities, or towards a new school.*
- 2 *Applicants will be expected to work in partnership with Hertfordshire County Council, and other neighbouring local authorities as appropriate, to ensure there are sufficient school places and facilities available to serve new housing developments. Some of the growth areas have sites for new primary/secondary schools specifically allocated within them, where an increase in education need has been identified. The school build zones have been identified and removed from the Green Belt where applicable, in order to ensure their deliverability and these are shown on the proposals map and the respective inset map.*

1 *Proposals for the creation of new or extended education facilities for all ages should:*

- 1 *be in an accessible location, served by a choice of sustainable travel options, on additional sites where new school provision has not been identified on the proposals map and the respective inset map;*
- 2 *have safe drop-off and pick-up provision;*
- 3 *be of high quality of design, which offers flexible use of facilities, in order to ensure the various needs of the community can be met; and*
- 4 *provide or retain a suitable provision of outdoor recreation space and playing*

Policy DM62: Sport and Leisure

Children's Services. With regard to paragraph 6 which states that: "New educational establishments must include facilities for community use and be subject to formal community use agreements" it should be noted that HCC only build to the size required, and would not be providing enhanced facilities over and above, unless they were to be funded by an external source, such as the LPA.

Included files

Title Healthy Communities

ID EGS8739

Person ID 1266752

Full Name Jayne Spademan

Organisation Details

Agent ID

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	In relation to (22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability. This Green Belt space has been hugely important and beneficial to the community during the COVID 19 pandemic and will continue to be an important resource for the health and well-being of the community - once it's gone - it's gone forever.
Included files	
Title	Healthy Communities
ID	EGS8744
Person ID	1266755
Full Name	Philip Spademan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	In relation to (22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability. This Green Belt space has been hugely important and beneficial to the community during the COVID 19 pandemic and will continue to be an important resource for the health and well-being of the community - once it's gone - it's gone forever.
Included files	
Title	Healthy Communities
ID	EGS8818
Person ID	1158356
Full Name	Colin Blundel

Organisation Details	Planning Officer Chiltern Society
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Policy DM59 - Health Facilities - The ongoing arguments about hospital availability has been resolved only by a proposed rebuild of Watford General. Trying to get to Watford quickly is impossible, and how much worse would it be when dealing with these additional numbers?</p> <p>Doctors' surgeries are under pressure in Berkhamsted, numbers increasing in the remaining 2 as 2 have closed, with no new premises. Two doctors' surgeries in Berkhamsted have amalgamated into one at different premises which provide only 6 patient car parking spaces. This illustrates the space issue, especially as this "new" surgery is being billed as the one to take all the new build residents as well as its existing numbers, a plus of some 660 residences including the 200 Bearroc homes. New infrastructure should be provided at the same time as any new build housing, as an integral part of the planning overall.</p> <p>Policy DM61 – Education - The Local Plan acknowledges a lack of school places and there are proposals for new secondary and primary schools, Ashlyns in Berkhamsted is full, and it is unclear how quickly they can be built. 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.</p> <p>Whilst there is a severe shortage of school places due to the massive increase in dwellings without requiring school provision, exacerbated by County policy of building houses on school sites. Who knew that demolishing a school, building family homes on the site and then finding that there were children needing to go to school where there was no school!</p>
Included files	
Title	Healthy Communities
ID	EGS8971
Person ID	1266893
Full Name	PENNY HARRISON
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<ul style="list-style-type: none"> 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)
Included files	
Title	Healthy Communities
ID	EGS9076
Person ID	1267067
Full Name	KATHRYN BROWN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities: we need and love our Green Belt land. It has always been an important health asset, even more so recently with so many residents accessing green space for walks. It also provides farm land for animals and wildlife.
Included files	
Title	Healthy Communities
ID	EGS9103
Person ID	1267074
Full Name	Joanne Howe
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	(22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS9160
Person ID	211352
Full Name	Mr Andrew Sanderson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Removing Green Belt areas used for recreation and walking are not conducive to health and well-being.</p> <p>Berkhamsted in particular already suffers a serious shortage of football pitches, there are no tennis courts, no publicly available table tennis areas and very little other recreational provision outside paid for clubs. The Plan has nothing to offer. Indeed, it appears to put housing before any other consideration although it acknowledges that there are already inadequacies in provision.</p> <p>Take for example Haslam Fields. These should be open for use for recreation by the public as the benefactors wished not given as a windfall housing development to Berkhamsted School.</p> <p>Haslam Field (BK03) is a sports ground owned by Berkhamsted School, which has been an important part of the Town since 1541. Haslam Field was gifted to the school and, at a meeting with the school's Headmaster around the time of the Core Strategy inquiry, BRAG was told by the school that it was a legal condition that they could not develop the</p>

land – it was gifted to be used as sports fields. Presumably, the school have found a legal way round these conditions, but clearly at the very least promoting the land goes directly against the spirit of the gift and the benefactors stated wishes, while BSGCA has reported that there is a shortage of pitches available to the community. If the pitches are “surplus to requirements” to the school, they are clearly not to the community. It is very much needed by the community and should be protected by any council that has the interests of its residents at heart.

The policy on Haslam fields also draws another unpalatable comparison with Hemel Hempstead where the provision of open recreational space is huge by comparison. Its under-used too, while in Berkhamsted there is scarcely any provision at all.

Included files	
Title	Healthy Communities
ID	EGS9238
Person ID	1264686
Full Name	Suzanne Doubleday
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS9291
Person ID	1267333

Full Name	JO MURPHY
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS9313
Person ID	1267332
Full Name	Nandi Jordan
Organisation Details	Chair Berkhamsted and Tring Labour Party
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Health Impact Assessments should be required in all residential developments of 25 units and above. All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator. Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.
Included files	

Title	Healthy Communities
ID	EGS9416
Person ID	1267392
Full Name	TANYA VERBEEK
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	(22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	

Title	Healthy Communities
ID	EGS9426
Person ID	1267395
Full Name	SIMON WEBB
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Buildings each new schools with community use sports facilities in consultation with local sports community to meet their needs. E.g. astroturfs and changing facilities
Included files	

Title	Healthy Communities
ID	EGS9502
Person ID	1267419
Full Name	Eric White
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>With respect to fostering Healthy Communities the decision to take away Green Belt robs the community of an important health resource and farm land that contributes food supply stability. And Green Belt land is unjustifiably threatened at Hemel Hempstead, Berkhamsted, Tring, Kings Langley, Bovingdon and Markyate. Ecologically, this represents a real threat to biodiversity in the region.</p> <p>For Dacorum to meet the government planning guidelines you are aiming to build over 1000 houses per year across the borough, much of it on greenbelt - that's more houses than allocated for Hull, Plymouth, Reading and Wolverhampton!</p> <p>There are no plans for sufficient health care provision and now plans for an urgently needed hospital in the area. The magical thinking involved in the planning document is breathtaking. 'We'll do one of three (uncosted) things, with some (uncosted and unspecified) stuff, maybe' is the mantra behind almost every feature of infrastructure here.</p>
Included files	
Title	Healthy Communities
ID	EGS9532
Person ID	1267427
Full Name	Megan Humphreys
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS9624
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	(22) <u>Healthy Communities</u> – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS9637
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Healthy Communities comment	(22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS9710
Person ID	1267479
Full Name	Roger Harrison
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
Healthy Communities comment	<ul style="list-style-type: none"> 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)
Included files	
Title	Healthy Communities
ID	EGS9722
Person ID	1267480
Full Name	Paul Townsend
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS9931
Person ID	1267774
Full Name	AATMA SEESURRUN
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS10000
Person ID	1267854
Full Name	MARTINA HALLEGGER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
Healthy Communities comment	<p>With respect to fostering Healthy Communities the decision to take away Green Belt robs the community of an important health resource and farm land that contributes food supply stability. And Green Belt land is unjustifiably threatened at Hemel Hempstead, Berkhamsted, Tring, Kings Langley, Bovingdon and Markyate. Ecologically, this represents a real threat to biodiversity in the region.</p> <p>For Dacorum to meet the government planning guidelines you are aiming to build over 1000 houses per year across the borough, much of it on greenbelt - that's more houses than allocated for Hull, Plymouth, Reading and Wolverhampton!</p> <p>There are no plans for sufficient health care provision and now plans for an urgently needed hospital in the area. The magical thinking involved in the planning document is breathtaking. 'We'll do one of three (uncosted) things, with some (uncosted and unspecified) stuff, maybe' is the mantra behind almost every feature of infrastructure here.</p>
Included files	
Title	Healthy Communities
ID	EGS10054
Person ID	1155402
Full Name	Christopher Stafford
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Healthy Communities comment	<p>(22)</p> <p>Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.</p>
Included files	
Title	Healthy Communities
ID	EGS10148

Person ID	1208053
Full Name	Nick Wilson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Sport & Recreation</p> <p>The property developers Thakeham are touting an alternative location to rival the Dacorum Local Plan sites – that of the proposed Bulbourne Cross site, between Bourne End & Berkhamsted. To tempt people to agree with the rival site, the Bulbourne Cross development boasts a brand-new sports facility.</p> <p>What funding will Dacorum provide for the improvement of existing community sports club facilities or perhaps the provision of new outdoor facilities, pitches etc? Once the proposed new housing is built, there needs to be easy access to community sports facilities for the increased population of Dacorum. The Dacorum Local Plan fails to provide this.</p>
Included files	
Title	Healthy Communities
ID	EGS10208
Person ID	1268108
Full Name	PAUL YARKER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	Having read the plans for new developments, I would like to voice major concerns over the lack of facilities (sports in particular due to the loss of some sports ground in the plan) already in Berkhamsted and Northchurch. These proposed development sites would create even more pressure and there seem to be no plans to deal with this.
Included files	
Title	Healthy Communities
ID	EGS10229
Person ID	1268167
Full Name	CHRIS YOUDELL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS10405
Person ID	1268432
Full Name	SARAH STUBBS
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS10459
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	We must work towards improving air quality in our towns, particularly close to our schools and in our High Streets. Improving sustainable transport will help address this. Providing additional allotments and wild spaces will help create healthy communities. Local sports facilities must be absolutely protected.
Included files	
Title	Healthy Communities
ID	EGS10684
Person ID	1161079
Full Name	Melanie Llewellyn
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Healthy Communities comment	<p>1. Removing Green Belt areas used for recreation and walking are not conducive to health and well-being.</p> <p>2. Berkhamsted in particular already suffers a serious shortage of football pitches, there are no tennis courts, no publicly available table tennis areas and very little other recreational provision outside paid for clubs. The Plan has nothing to offer. Indeed, it appears to put housing before any other consideration although it acknowledges that there are already inadequacies in provision. Take for example Haslam Fields. These should be open for use for recreation by the public as the benefactors wished not given as a windfall housing development to Berkhamsted School.</p> <p>Haslam Field (BK03) is a sports ground owned by Berkhamsted School, which has been an important part of the Town since 1541. Haslam Field was gifted to the school and, at a meeting with the school's Headmaster around the time of the Core Strategy inquiry, BRAG was told by the school that it was a legal condition that they could not develop the land – it was gifted to be used as sports fields. Presumably, the school have found a legal way round these conditions, but clearly at the very least promoting the land goes directly against the spirit of the gift and the benefactors stated wishes, while</p> <p>BSGCA has reported that there is a shortage of pitches available to the community. If the pitches are “surplus to requirements” to the school, they are clearly not to the community. It is very much needed by the community and should be protected by any council that has the interests of its residents at heart. The policy on Haslam fields also draws another unpalatable comparison with Hemel Hempstead where the provision of open recreational space is huge by comparison. Its under-used too, while in Berkhamsted there is scarcely any provision at all.</p>
Included files	
Title	Healthy Communities
ID	EGS10725
Person ID	1145421
Full Name	Mrs Shirley White
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.

Included files	
Title	Healthy Communities
ID	EGS10744
Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS10816
Person ID	1268768
Full Name	Amanda Stafford
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS10960
Person ID	1268886
Full Name	Mr Paul Jayson
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS11170
Person ID	1262170
Full Name	Julie Banks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	

Healthy Communities comment	Social Community , I absolutely welcome out line plans showing open space, green corridors and tree planting but how will residents be encourage to use these spaces, who will manage them and will they genuinely link up to protect and enhance our wild life and provide amenities that can be used by residents, sporty clubs and families?
Included files	
Title	Healthy Communities
ID	EGS11388
Person ID	1207629
Full Name	Strategic Planning Department
Organisation Details	Strategic Planning Department Three Rivers District Council
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>Policy DM61 – Education: We recognise that additional housing growth will result in an increased demand for school places and the importance of working with Hertfordshire County Council and neighbouring authorities. We therefore welcome this policy in its requirement for development to make an appropriate contribution to existing or new education facilities. For strategic site allocations, it will be important for education provision to come forward in the early phase of site development in order to support population growth.</p> <p>Policy DM62 – Sport and Leisure: TRDC undertook a joint Open Space, Sport & Recreation Study with Dacorum Borough Council and Hertsmere Borough Council. The policy is welcomed in seeking to ensure the protection of sport and leisure provision and in seeking contributions from development towards existing/future provision. Securing community use agreements on educational sites will provide security for sports clubs and was a recommended action in the Open Space, Sport & Recreation Study; the inclusion of a requirement for community use agreements for new educational established in Policy DM62 is therefore welcomed and it would also be encouraged that community use agreements are secured on existing educational sites where formal agreements may not yet exist.</p>
Included files	
Title	Healthy Communities
ID	EGS11430

Person ID	1269025
Full Name	JOHN MAWER
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>1 Healthy Communities See earlier comments on sustainable transport and link this into climate change and sustainability. Encouraging people to walk and cycle is all very well, but if they are confronted by traffic priorities, and in particular rat running country lanes, it will not happen.</p>
Included files	
Title	Healthy Communities
ID	EGS11448
Person ID	1264362
Full Name	Juliet Miller
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p>

Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.

Included files

Title Healthy Communities

ID EGS11599

Person ID 1269148

Full Name SIMON AND ANNA BARNARD

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Healthy Communities comment

Policy DM59 - Health Facilities – The ongoing arguments about hospital availability will continue as the considerable increase in population in the area will add a sizable strain on the outdated Watford General. With a proposed increase in population in the Borough, more emphasis must be paid to the provision of improved health care. Hemel Hospital is all but to be closed and doctor's surgeries are under pressure, especially in Berkhamsted where the number of Doctor's surgeries has dropped from 4 to 2 with no improvement despite the additional 200+ dwellings under construction. New infrastructure appears to be low on the Council's list and even after housing development has been approved and built little is done to improve this.

Policy DM61 – Education – The Local Plan acknowledges a lack of school places with most primary and secondary schools full. However, specific proposals for new secondary and primary schools are lacking in any meaningful detail - exactly where and when. E.g., despite it being known that there is a need for a primary school to serve the enlarged community in West Hemel Hempstead, the developers of 1100 dwellings will only allocate land for a school - not actually build it. That has been left to the County Council who may not be able to fund it.

Included files

Title Healthy Communities

ID EGS11687

Person ID	1269212
Full Name	PETER SCOTT
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS11762
Person ID	1118045
Full Name	Mr Padraig Dowd
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Even before the COVID pandemic, there were many studies on the essentials of good planning and equally, what is harmful to achieving this. It is not simply the standards of housing units but much more about the elements of healthy, happy communal living. These studies cover both city and urban/rural spaces. While you discuss what this could look</p>

like, you then proceed not to take account of them in your Plan. These requirements have continued to gain momentum over the past few decades and will now gain even greater focus now as we re-evaluate how we want to live. There is no firm, clear and reliable policy of not encroaching on Green Belt land and areas of AONB. I fear that that DBC has neither the legal authority not commitment to ensure this through it is stated to be an over-riding principle.

Included files	
Title	Healthy Communities
ID	EGS11874
Person ID	1269275
Full Name	KALLIOPI KOUTSOU
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS11892
Person ID	1269277
Full Name	DEFINE PLANNING AND DESIGN LTD
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
Healthy Communities comment	<p>POLICY DM63 – OPEN SPACE PROVISIONS:</p> <p>BHL recognises the importance of open space in new residential developments.</p> <p>BHL notes that the plan’s overall open space provision requirement of 3.2ha per 1,000 population is derived from the <i>Fields in Trust</i> ‘Beyond the Six Acre Standard’ report, which is clear in stating that the standards should be used only as a benchmark for local authorities.</p> <p>In this regard, BHL is of the view that the open space requirements should be substantiated on localised evidence that takes account of current open space provision within the Borough, to ensure that open space provision in new developments responds to the existing demand in the locality, rather than a generic space standard derived from national trends. Furthermore, that approach would be underpinned by relevant and proportionate evidence as per NPPF paragraph 31.</p> <p>In addition, whilst an indicative open space requirement such as that set out in Table 30 is appreciated, the policy should explicitly allow some flexibility in the composition of open space provision. The policy should, therefore, clearly state that open space provision should reflect other factors, including up-to-date evidence of <u>localised</u> need, area and site-specific constraints, and viability considerations.</p>
Included files	
Title	Healthy Communities
ID	EGS11960
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 * No	Yes
Healthy Communities comment	22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	

Title	Healthy Communities
ID	EGS11991
Person ID	1269352
Full Name	Walid Youssef
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.
Included files	

Title	Healthy Communities
ID	EGS12035
Person ID	1269358
Full Name	Mr Tim Duggleby
Organisation Details	Associate Director Redevelopment Programme West Hertfordshire Hospitals NHS Trust
Agent ID	1269359
Agent Name	Mr Tom Rudd
Agent Organisation	BDP
Yes / No * Yes * No	Yes
Healthy Communities comment	Policy DM59 Health Facilities provides support for the provision, expansion and improvement of health facilities in line with the Herts Valleys CCG and NHS England requirements. The Trust supports these aims, which are consistent with

the strategic objectives of the Plan. The Trust also supports the general statement within supporting text at paragraphs 22.20 and 22.21 which discusses the future of healthcare provision at the Hemel Hempstead Hospital Site, and will work with Herts Valley CCG to develop both the model for acute service provision to be delivered on the site and to identify the most appropriate location for the Urgent Treatment Centre. The Trust strategy aims to complete the redevelopment of the current Hemel Hempstead Hospital Site by 2027, with work starting in 2022.

Included files

Title Healthy Communities

ID EGS12135

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

Healthy Communities comment

1 Healthy Communities

22.1 – 22.13 As one would expect, TSF is massively in favour of integrating physical and mental health needs into the plan. Adequate sport and leisure facilities, together with easy access to these by healthy means and adequate active leisure facilities close to residential areas are absolutely vital. However, we do not consider the proposed mix of development at Dunsley Farm achieves these ends, especially as a large industrial area, with all the inevitable van & lorry movements, noises and smells, etc. that go with it, is proposed to sit alongside the houses and would inevitably stifle the design of safe cycleways, footpaths, MUGA's and other sport and leisure facilities.

Policy DM59 - Health Facilities, Policy DM60 – Health Impact Assessments,

Policy DM61 - Education

22.39-22.44 TSF are very concerned that the 2019 reports by KKP which fed into the Infrastructure Delivery Plan is out of date. There is a need to update these annually.

Policy DM62 Sport & Leisure

No objections to this policy, but please see our comments on Sport & Leisure below.

22.47 This concerns us somewhat. Conversations in the past with officers at HCC and DBC have led us to believe that developers are able to give-over part of the land that is being developed to sports clubs and the like in lieu of Section 106/CIL payments that would otherwise be required. This clause puts doubt in our minds, although it is the 'Open Space,' not the 'Sport & Leisure' section. Below we shall briefly outline our basic ideas for the Masterplan; hopefully there are ways that such ideas are able to be taken on board and early discussions can take place.

Policy DM63 Open Space Provision

No objections

Policy DM64 Community Facilities

No objections

Policy DM 65 Community Stewardship & Management

No objections

Included files

Title Healthy Communities

ID EGS12238

Person ID 1269478

Full Name NIGEL TAYLOR

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

Healthy Communities comment

- 1 The draft plan has not addressed how the provision of Schools and health care will be provided.
- 2 The plan has not addressed the need for recreational locations. Some locations such as the National Trust at Ashridge report, they are not able to sustain more people and have urged local authorities to make alternative provision of land for recreational use.

Included files

Title Healthy Communities

ID EGS12281

Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	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)
Included files	
Title	Healthy Communities
ID	EGS12344
Person ID	1269489
Full Name	STEVE HILL
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities 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	Healthy Communities
ID	EGS12441

Person ID	1146040
Full Name	Mrs Rachel Macdonald
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>Healthy Communities</p> <p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS12866
Person ID	1269661
Full Name	Ray Guirguis
Organisation Details	OSD Healthcare
Agent ID	1269662
Agent Name	Nick Baker
Agent Organisation	Planning Director Lichfields
Yes / No * Yes * No	

Healthy Communities comment	<p><i>Policy DM59 – Health Facilities</i></p> <p>OSD welcomes the recognition in the draft plan that the health and wellbeing of our communities is crucially important to delivering long term sustainable development and placemaking, and that planning and health need to be considered together in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system.</p> <p>Policy DM59 is generally supported, and OSD in particular supports Parts 1 and 3 of the Policy which refer to the support for the provision, expansion or improvement of health facilities in the Borough.</p> <p><i>Policy DM64 – Community Facilities</i></p> <p>NPPF Paragraph 20, part c notes that health infrastructure falls under community facilities. As such, draft Policy DM64 is considered generally appropriate to protect existing community facilities and OSD welcomes the commitment that new facilities will be supported in principle. The local plan should however be consistent with the NPPF in its definition of community facilities.</p>
Included files	
Title	Healthy Communities
ID	EGS12880
Person ID	1269665
Full Name	Mr Martin Hicks
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>22 Healthy Communities. I support the inclusion of Food and Healthy Choices in 22.23 as one of the key areas where planning affects health. However it is disappointing there are no further references to this, which means there are no measures to support delivery. In this regard, such aspirations are not sustainable.</p> <p>Policy DM65 - Community Stewardship and Management. Whilst this is supported, the long term engagement of local community involvement to manage open spaces and facilities should not unreasonably offset this responsibility to communities or in a way which undermines their original planning requirements. This may include changes to management</p>

of land to amenity or other uses as opposed to biodiversity, which may not be considered desirable, e.g. leaving areas of grass to grow long.

Included files

Title Healthy Communities

ID EGS12901

Person ID 1207443

Full Name Mrs Jennifer Bissmire

Organisation Details Clerk
Markyate Parish Council

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

* No

Healthy Communities comment Healthy Communities Health Facilities

Included files

Title Healthy Communities

ID EGS13055

Person ID 1270013

Full Name Mr Daniel Ritchie

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No

* Yes

Yes

* No	
Healthy Communities comment	<p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS13216
Person ID	1270128
Full Name	Richard Salway
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
Healthy Communities comment	<p>Retailing and Other Town Centre Uses</p> <p>There should be protection for public houses written into the local plan. Applications for the change of use, redevelopment and/or demolition of a public house should have to demonstrate that:</p> <ul style="list-style-type: none"> the public house use is no longer economically viable; a viability report must be submitted, and this must include evidence of active and appropriate marketing over a continuous period of at least 12 months and evidence that all reasonable efforts have been made to preserve the facility; the proposal would not result in the loss of a service or facility of value to the local community; and community ownership should be preferred to change of use/redevelopment and/or demolition
Included files	
Title	Healthy Communities

ID	EGS13249
Person ID	1270143
Full Name	Mr Thomas Parsons
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<ul style="list-style-type: none"> 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)
Included files	
Title	Healthy Communities
ID	EGS13330
Person ID	1270200
Full Name	Mr Richard Harman
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<ul style="list-style-type: none"> Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities

ID	EGS13369
Person ID	924129
Full Name	Mrs Natalia McIntosh
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	(22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS13396
Person ID	1153922
Full Name	Roger Hyslop
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	(22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities

ID	EGS13551
Person ID	1260521
Full Name	Steve Ritchie
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS13581
Person ID	1227768
Full Name	Ms Denise Young
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	

- 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)

Included files

Title Healthy Communities

ID EGS13646

Person ID 1265149

Full Name David Lillywhite

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment

CONCEPT: Regarding Dacorum Council owned residential accommodation: Where there is insufficient space to accommodate communal ground level gardens for growing food - or where there are no nearby and easily accessible existing similar potential facilities for communal food cultivation such as Friends of Jellicoe in the Hemel Hempstead Water Gardens, or Sunnyside Food project supporting young adults with learning difficulties, or Dacorum Council allotments – then could Dacorum Council consider in it's Local Plan (2020-2038) the following ideas regarding community healthy food producing roof garden spaces:

- Incorporate as many roof gardens as possible both on new council owned high rise accommodation and retrofitted on existing council high rise accommodation.
- Roof garden – allotment on the roof aimed at adults and for children aged 0-18 years old.
- Safety is of paramount concern – unscalable high secure fencing, which if possible also at the same time lets as much light through as possible.
- Focus – growing healthy food for members of the community who otherwise could not readily grow their own crops.
- Individual choices which fruit & vegetables (from different cultures/backgrounds) to cultivate.
- Experiential activity for children of all ages.
- Educational activity through experience of growing their own food, processing, cooking and eating – children get to appreciate the journey from plant seed/seedling to their dinner plate.
- Kids learn to appreciate and respect plants.

- Kids understand the important part plants play in providing good nutrition.
- Build sense of community / teamwork.
- These roof gardens would serve a very practical purpose of producing home grown food for families who would otherwise not have this option due to the current design and location of their council accommodation.
- Flowers could also be grown for the aesthetic pleasure they would give to families and children.
- ‘Family driven’ project/management rather than by gardening experts would be preferable to empower participating families and children.
- The recent on-going experience of Covid -19 community lock-down has highlighted the potential benefits of having access to roof gardens where people without ground level gardens can get out of their apartments and have direct contact with nature by continuing to nurture food plants.
- These roof gardens would need to be designed and managed in a way so that in future pandemic lock-downs they could remain as open as as is possible while still observing social distancing rules.

Included files

Title Healthy Communities

ID EGS13647

Person ID 1270344

Full Name MS MARIANA PENEVA

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment

CONCEPT: Regarding Dacorum Council owned residential accommodation: Where there is insufficient space to accommodate communal ground level gardens for growing food - or where there are no nearby and easily accessible existing similar potential facilities for communal food cultivation such as Friends of Jellicoe in the Hemel Hempstead Water Gardens, or Sunnyside Food project supporting young adults with learning difficulties, or Dacorum Council allotments – then could Dacorum Council consider in it’s Local Plan (2020-2038) the following ideas regarding community healthy food producing roof garden spaces:

- Incorporate as many roof gardens as possible both on new council owned high rise accommodation and retrofitted on existing council high rise accommodation.
- Roof garden – allotment on the roof aimed at adults and for children aged 0-18 years old.
- Safety is of paramount concern – unscalable high secure fencing, which if possible also at the same time lets as much light through as possible.
- Focus – growing healthy food for members of the community who otherwise could not readily grow their own crops.
- Individual choices which fruit & vegetables (from different cultures/backgrounds) to cultivate.
- Experiential activity for children of all ages.
- Educational activity through experience of growing their own food, processing, cooking and eating – children get to appreciate the journey from plant seed/seedling to their dinner plate.
- Kids learn to appreciate and respect plants.
- Kids understand the important part plants play in providing good nutrition.
- Build sense of community / teamwork.
- These roof gardens would serve a very practical purpose of producing home grown food for families who would otherwise not have this option due to the current design and location of their council accommodation.
- Flowers could also be grown for the aesthetic pleasure they would give to families and children.
- ‘Family driven’ project/management rather than by gardening experts would be preferable to empower participating families and children.
- The recent on-going experience of Covid -19 community lock-down has highlighted the potential benefits of having access to roof gardens where people without ground level gardens can get out of their apartments and have direct contact with nature by continuing to nurture food plants.
- These roof gardens would need to be designed and managed in a way so that in future pandemic lock-downs they could remain as open as as is possible while still observing social distancing rules.

Included files

Title	Healthy Communities
ID	EGS13685
Person ID	1207133
Full Name	Chilterns Conservation Board
Organisation Details	Chilterns Conservation Board

Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	DM59 Health Comment. There is an opportunity missed in this section to refer to the positive benefits on the physical and mental health and well-being of Dacorum's residents of the Chilterns AONB and other aspects of its natural open spaces. Conservation and enhancement of the AONB should be seen explicitly as investment in the community's health.
Included files	
Title	Healthy Communities
ID	EGS13761
Person ID	1270372
Full Name	Janet Tuppen
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	18. Provision for school places and other infrastructure – this relies on decisions by Hertfordshire County Council and not on decisions from Dacorum. Despite potential provision for schools in some of the site plans, there is no guarantee these will happen.
Included files	
Title	Healthy Communities
ID	EGS13798
Person ID	

Full Name	
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	? 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)
Included files	
Title	Healthy Communities
ID	EGS13900
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p>Healthy Communities</p> <p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>

Included files	
Title	Healthy Communities
ID	EGS13914
Person ID	1207810
Full Name	Louisa Groves
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	Healthy Communities - your proposal instantly creates an unhealthy community! You are proposing to build on land precious to local communities, remove green spaces and over develop an area of outstanding natural beauty. Your proposal will and already has caused mental health issues!
Included files	
Title	Healthy Communities
ID	EGS13985
Person ID	1270411
Full Name	Ms Jacqui Parr
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	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)

Included files	
Title	Healthy Communities
ID	EGS14108
Person ID	1270501
Full Name	DAVID WHITE
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	The Guiding Development policies put the need to meet housing targets above considerations such as climate change, sustainability, biodiversity and the need to promote public health. The Green Belt plays a key role in protecting the environment whilst overcrowding, traffic congestion and pollution harms people's physical and mental wellbeing.
Included files	
Title	Healthy Communities
ID	EGS14259
Person ID	1152075
Full Name	Rob Wakely
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes

Healthy Communities comment	<p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS14285
Person ID	1270629
Full Name	Rob Bray
Organisation Details	Head of Sponsorship & Fundraising Tring Rugby Club
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	(22) Healthy Communities – taking away Green Belt robs the community of an important health resource and farmland that contributes food supply stability.
Included files	
Title	Healthy Communities
ID	EGS14373
Person ID	1270640
Full Name	Geoffrey Llewellyn
Organisation Details	
Agent ID	

Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>1 Removing Green Belt areas used for recreation and walking are not conducive to health and well-being.</p> <p>2 Berkhamsted in particular already suffers a serious shortage of football pitches, there are no tennis courts, no publicly available table tennis areas and very little other recreational provision outside paid for clubs. The Plan has nothing to offer. Indeed, it appears to put housing before any other consideration although it acknowledges that there are already inadequacies in provision. Take for example Haslam Fields. These should be open for use for recreation by the public as the benefactors wished not given as a windfall housing development to Berkhamsted School.</p> <p>Haslam Field (BK03) is a sports ground owned by Berkhamsted School, which has been an important part of the Town since 1541. Haslam Field was gifted to the school and, at a meeting with the school's Headmaster around the time of the Core Strategy inquiry, BRAG was told by the school that it was a legal condition that they could not develop the land – it was gifted to be used as sports fields.</p> <p>Presumably, the school have found a legal way round these conditions, but clearly at the very least promoting the land goes directly against the spirit of the gift and the benefactors stated wishes, while BSGCA has reported that there is a shortage of pitches available to the community. If the pitches are “surplus to requirements” to the school, they are clearly not to the community. It is very much needed by the community and should be protected by any council that has the interests of its residents at heart.</p> <p>The policy on Haslam fields also draws another unpalatable comparison with Hemel Hempstead where the provision of open recreational space is huge by comparison. Its under-used too, while in Berkhamsted there is scarcely any provision at all.</p>
Included files	
Title	Healthy Communities
ID	EGS14529
Person ID	1270690
Full Name	Akzo Nobel CIF Nominees Ltd
Organisation Details	
Agent ID	
Agent Name	

Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	In relation to existing community facilities, our client supports the pragmatic approach under Policy DM64, whereby such facilities will be protected unless in specific circumstances where evidence can be submitted to support the loss, the loss may be offset by nearby facilities or alternative community provision is proposed. Land at 168-192 High Street, Berkhamsted has the potential to deliver a new community floorspace as part of either a residential-led mixed-use redevelopment or managed later- living scheme.
Included files	
Title	Healthy Communities
ID	EGS14762
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759
Agent Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>5.5 Policy DM59 Health Facilities sets out that new developments will be expected to make appropriate contributions to new health care provision in accordance with the Council's IDP. It should be noted that a recent Secretary of State decision has made it clear that NHS Acute contributions associated with allocations should be considered at Local Plan stage and not left to application stage1. This should be included in any viability testing of the Local Plan.</p> <p>5.6 Policy DM60 Health Impact Assessments requires HIAs for all identified Growth Areas. The supporting text for this policy states that a guidance note detailing the process for this will be provided separately. Whilst there is no objection to the principle of HIAs, L&Q Estates reserve the right to comment on the contents of any guidance note.</p> <p>5.7 Policy DM61 Education seeks to ensure there are sufficient school places to serve new housing developments. Where there is a need this may delivered through new schools or expansion of existing schools. These may either be</p>

delivered through extensions to existing schools or new schools where set out in proposed allocation. Other developments not allocated to deliver a school will make suitable development contributions where appropriate.

Included files

Title Healthy Communities

ID EGS14893

Person ID 1144629

Full Name Mrs SOPHIE LAWRANCE

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment DM62 (Sport and leisure) - it should be recognised that the focus on "playing fields" is overly narrow, and that many residents would prefer access to natural / rewilded areas for walking, mountain biking etc.

Included files

Title Healthy Communities

ID EGS14967

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	
Healthy Communities comment	<p>Healthy communities Education</p> <p>HCC recognises that it has a role to play in delivering all necessary infrastructure associated with new development, as would be the case with any other commercial property developer. In the case of Dunsley Farm Growth Area (Tr01), HCC has incorporated land for the provision of a primary school if it is required on this site. HCC will continue to work with HCC Growth and Infrastructure Unit and DBC to accommodate the necessary education facilities in line with the level of development being proposed at Dunsley Farm, and in line with evidence in relation to the appropriate locations for both primary and secondary education provision in Tring.</p>
Included files	
Title	Healthy Communities
ID	EGS14975
Person ID	1207224
Full Name	Chris Padley
Organisation Details	Environment Agency
Agent ID	
Agent Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
Healthy Communities comment	<p><u>Healthy Communities</u></p> <p>We are pleased to see in paragraph 22.2 that the positive impacts of green (and blue) infrastructure has on health and wellbeing. Green spaces and nature should be enhanced wherever possible to maximise benefits for health and wellbeing.</p>
Included files	
Title	Healthy Communities
ID	EGS15064
Person ID	1270849

Full Name	Ms Jessica Lindfield
Organisation Details	St William Homes LLP
Agent ID	210999
Agent Name	Mr Martin Friend
Agent Organisation	Director Vincent & Gorbing
Yes / No * Yes * No	
Healthy Communities comment	<p>Healthy Communities</p> <p>St William support the council’s objective to improve the health and well-being of its residents and the proposal to ensure that the healthy communities agenda is embraced as part of the development management process. Health and well-being are central to the St William approach to design-led placemaking and understands that the planning framework is a powerful tool for creating places that will play a vital role in the health and wellbeing of communities, which has become even more important as a result of the Covid-19 pandemic.</p> <p>Open Space</p> <p>St William consider that the approach to open space provision must be flexible and take account of different development typologies in defining the amount and role of open space within new development. It is noted that DM63, in defining the overall amount of open space to be provided states that <i>“Where this cannot be delivered within the development, contributions will be sought towards improving or delivering open space off-site.”</i> St William support this approach.</p> <p>The same approach should be taken to play space requirements set out in DM63(5), where a mix of on-site and off-site provision may be more appropriate depending on the location of the site in relation to existing local recreational facilities. For example, whilst new development may necessarily provide play space for smaller children, the provision of MUGAs for active play may be more beneficially located in existing larger areas of open space in proximity to new development rather than within the development itself. This provides for wider access for the local community and assists with design and amenity issues within the new development. A new clause should be added to the policy as follows :-</p> <p><i>“Aside from LAPS (that should be generally be located within the development) off-site provision or contributions to off-site provision may be appropriate if this can be justified on the basis of wider community access, site optimisation and place making.</i></p>
Included files	
Title	Healthy Communities

ID	EGS15150
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>The Guiding Development policies put the need to meet housing targets above considerations such as climate change, sustainability, biodiversity and the need to promote public health. The Green Belt plays a key role in protecting the environment whilst overcrowding, traffic congestion and pollution harms people's physical and mental wellbeing. However, according to conservation group WWF, the UK is one of the most "nature depleted countries in the world". Ahead of hosting the November global climate conference, known as COP 26, the government wants councils to take action to protect the natural world, not to destroy large areas of Green Belt.</p> <p>There is a consensus across the natural, social, and health sciences on the impacts of nature experience on cognitive functioning, emotional well-being, and other dimensions of mental health: "According to numerous studies carried out after the first lockdown, being around nature is crucial to people's mental and physical health." https://advances.sciencemag.org/content/5/7/eaax0903</p> <p>Connecting with nature can help us feel happier and more energised, with an increased sense of meaning and purpose, as well as making tasks seem more manageable. On 26 February 2021, Hilary McGrady, director general of the National Trust, announced plans to plant blossom trees in cities to give people access to green space. The Green Belt fields in Northchurch give residents easy access to green space: somewhere, within walking distance of their homes, that people can breathe fresh air, connect with nature, and find solace during difficult times. Replacing this green space with brick, tarmac, noise and concrete will harm people's physical and mental wellbeing.</p>
Included files	
Title	Healthy Communities
ID	EGS15167
Person ID	1270925
Full Name	Mrs Kathryn Salway

Organisation Details	Extinction Rebellion Dacorum
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Healthy Communities</p> <p>Health Impact Assessments should be required in all residential developments of 25 units and above.</p> <p>All new residential development above 20 units must be required to contribute towards additional leisure facilities provision. These should be calculated using Sport England's Sport Facility Calculator.</p> <p>Developers must be required to make appropriate contributions to new health care provision to support residents in accordance with the Council's Infrastructure Delivery Plan as a condition of agreeing permission for the development.</p>
Included files	
Title	Healthy Communities
ID	EGS15234
Person ID	1271006
Full Name	Ms Zoe Wiggins
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	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)

Included files	
Title	Healthy Communities
ID	EGS15294
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	
Healthy Communities comment	<p><u>Chapter 22 : Healthy Communities</u></p> <p>TCE supports the aims of this Chapter, but would draw your attention to the following detailed point:</p> <ul style="list-style-type: none"> • Policy DM63 : Whilst the open space standards in DM63 are appropriate, it may be the case with Hemel Garden Community that site constraints and master planning requirements lead to the location of more open space in one LPA and less in the other. This would be acceptable as long as the total standard is met across HGC and is justified by master planning evidence.
Included files	
Title	Healthy Communities
ID	EGS15465
Person ID	1271103
Full Name	GRAHAM RITCHIE
Organisation Details	FAIRFAX STRATEGIC LAND (HEMEL) LTD
Agent ID	
Agent Name	
Agent Organisation	

Yes / No * Yes * No	Yes
Healthy Communities comment	SEE ATTACHED RESP
Included files	
Title	Healthy Communities
ID	EGS15530
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<p>Background to DSN: Dacorum Sports Network (DSN) represents local community sports clubs and those participating in sport within the Dacorum community. We have been consulting with and lobbying Dacorum Borough Council for many years helping to establish the opportunities and needs for sporting facility development locally. This has included contributing to and consulting on the Council's 'Playing Pitch Strategies & Action Plans' (PPS) - the latest being June 2019 and the recently developed Sports and Leisure Strategy. We are also represented on the DBC Sport and Leisure Action Board and have made submissions to previous local plans.</p> <p>This document is DSN's response to the Local Plan and is our submission to the Consultation process for that plan. Our objective is that the needs of sport in Dacorum will be fully represented to try and ensure that the plan will, not only address current well documented need, but also meet the further increase in sporting facilities needed to meet the significant population growth that will result from the massive increase in housing numbers.</p> <p>The benefits to DBC of working with DSN and local community clubs: We appreciate that all Local Councils are struggling to balance what has been decreasing income and increased demand for services over recent years (although this may in the future be partially mitigated by the increased housing numbers). So, planning for sustainable development of new sporting facilities and working in partnership with third sector partners (such as DSN and sports' NGBs) becomes essential, as this can provide access to additional funding, and partners who can undertake facility development and management at little or no cost to the Council; and especially if planning strategy enables such facilities to be planned</p>

and developed in sustainable formats (especially in larger concentrated units, such as hubs and multi-sport venues) that can be managed by the community, including by well-established clubs.

DSN are uniquely placed to understand local sporting needs, the opportunities for development of new facilities; and the ability to bring together local partners (including clubs, other community and charitable organisation and potential new funding contributors) to help facilitate development and or management of such new facilities.

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

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

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

DSN believe that 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.

Special attention to local needs as well as Borough wide provision: 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 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.

Furthermore, a plan should be developed to take advantage of the scale of the Hemel Garden Communities (HGC) development, and the green spaces that will be needed within it, to create major new sporting facilities and venues. This

would support the principles laid out in the HGC Charter - Principle 1 (Connective Green Infrastructure); Principle 4 (Vibrant Communities); and Principle 9 (Active Local Stewardship).

The importance of Hubs: In the past, new housing plans have tended to include the ad-hoc sprinkling of individual football pitches or play spaces within individual developments, as this was seen by developers as a way to satisfy green space provision and section 106/CIL contributions. However, such facilities have been clearly proven to be unsustainable and now go against Sport England guidance.

Such isolated playing spaces attract vandalism, are expensive to maintain and are unusable by organised sports clubs because of lack of support facilities and non-contiguous positioning. Larger multi-sport/multiuse facilities are much more sustainable and contiguous pitches and facilities can be better managed and maintained as community assets by the local communities and clubs that use them.

This is supported by DBC's Playing Pitch Strategy which states:

“For large scale developments, it is likely that demand will be potentially generated for larger sports such as football and/or cricket. Consideration should be given to providing multi-pitch sites with suitable ancillary provision, including appropriate clubhouse/changing facilities and carparking. Single pitch sites which have been provided traditionally by developers are not considered to provide long term sustainable provision for pitch sports.”

Therefore, proposals for developments such as that by Thakeham at Bulbourne Cross (in partnership with the Berkhamsted Sports Grounds Charity Association) which incorporates a consolidated and sustainable new multi-facility sporting hub should be encouraged and given preference. Other appropriate developments should also be directed to seek ways of incorporating such sporting facilities within their plans, especially where this would meet local demand.

The need for a major new sporting hub and extra 15 Ha of playing space in Tring has been well represented to DBC planners for many years and is supported by the Town Council. This was just to meet existing demand, so it is clear one or more new sporting hubs are needed in Tring (similar to that proposed by Thakeham for Berkhamsted) to meet the proposed increase in population there.

Hemel Garden Communities: As stated in the HGC Charter this is a “once in a generation opportunity to have a transformational impact on Hemel Hempstead”. If HGC is to create inspirational new communities and deliver exemplar infrastructure and community facilities, then sport and leisure should be a key element of its Structured Delivery Plan (SDP).

The size and scale of the HGC developments provides significant opportunities for major new sporting hubs to be created – perhaps in association with the proposed country parks or as gateways to these. In addition, the requirement for open

spaces and community centres within the individual communities of HGC can be facilitated by and developed by sports clubs (see below).

This would be in keeping with many of DBC's HGC Charter principles and strategies including "*Active Local Stewardship*", "*Innovative Approaches to Delivery*" and "*Vibrant Communities*".

Community Sports Clubs provide today's most active community centres: Local community sports clubs not only provide and maintain facilities for sporting participation, they are also vibrant examples of community engagement. Communities get together on touchlines and in club houses - social centres where community, families and especially young people meet and integrate. They also provide local meeting facilities for communities and businesses, fulfilling the role that in the past was filled by village halls and community centres.

Using existing clubs as delivery and asset management partners: Utilising existing well managed local clubs as the delivery partners for developing and or managing new/extended sports facilities/ hubs would provide significant benefits and is in tune with the following of DBC's Strategic Objectives:

"Supporting Community Health, Wellbeing and Cohesion

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

Local community clubs as both users and stewards of such facilities will provide ongoing sustainable development, maintenance, care and management. As well as providing organised play space, most sports clubs usually provide casual open space for public access; and with those clubs and the local communities that use them monitoring and policing these spaces, they maximise safe public use while protecting them against misuse and abuse.

Developers should be encouraged to seek out local clubs/partners to work with on such projects.

Major new indoor facilities needed: Most of the sports centres within the Borough are old and in need of replacement or major refurbishment (e.g Tring and Berkhamsted). There is also a shortfall in swimming pools and other indoor playing facilities such as netball, indoor cricket nets, indoor bowls etc.

While the restrictions of limited Local Council funding may have made such shortfalls understandable (although hardly acceptable) in the past, the scale of the new plan, the infrastructure spending that will accompany it and the massive increase in population makes this not only a requirement but also a not to be missed opportunity for new indoor facilities to be created and existing ones rebuilt or refurbished. At least one major new sports centre, new swimming pools and major refurbishment of existing centres and pools is the minimum that will be needed. In addition, specialist indoor sports

facilities should also be considered and encouraged. For example, an open invitation to Sports' National Governing Bodies (NGBs) to consider Dacorum as a welcoming venue for development of new regional or even national centres would be a first step – and with Hemel Hempstead's location and favourable transport links it would be an ideal location for any such sporting projects (indoor and outdoor).

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 coconcerted 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.”*

Included files	Dacorum Sports Network - Andy Criddle DSN response to local plan overview_Redacted.pdf
Title	Healthy Communities
ID	EGS15646
Person ID	1271974
Full Name	EMILY FORD
Organisation Details	SENIOR PLANNER
Agent ID	
Agent Name	
Agent Organisation	
Yes / No * Yes * No	Yes
Healthy Communities comment	<ul style="list-style-type: none"> • To ensure that the maximum benefit can be achieved from new sport and leisure facilities, for existing and new residents, we recommend that consideration is given to the most appropriate location for new facilities, taking account of the nature of the land available as well as accessibility by sustainable modes of • In this regard, any new facilities such as sports pitches at Berkhamsted for example should be directed to locations with appropriate topography, space and • We recognise that the Open Space, Sport and Leisure Topic Paper (November 2020) identifies a current and future shortfall in Berkhamsted of grass and 3G football pitches and rugby To help mitigate this, opportunities for multi-functional sport and leisure facilities should be considered, for example school playing fields with dual community use.

- Croudace recognise the need for the appropriate management of new open space and community Croudace agree that involvement of the local community as part of a wider long term management strategy of assets is beneficial to create a sense of ownership and the delivery of the social objectives of sustainable development, as set out by the NPPF (paragraph 8). The form of any management or community stewardship strategy needs to be informed by a number of site-specific factors and therefore we welcome the flexibility in the policy as currently drafted.

Included files

Title Healthy Communities

ID EGS15653

Person ID 1271978

Full Name JOANNA HARLEY

Organisation Details

Agent ID

Agent Name

Agent Organisation

Yes / No Yes

* Yes

* No

Healthy Communities comment

- 1 Increase medical provision in neighbourhoods, potentially using the community
 - 1 Ensure adequate provision for education, siting schools within walking distance of new development (or new development within walking distance of existing schools).
- 2 Communal gardens and allotments provided on all new
 - 1 Maximise water efficiency and recycling potential to ensure continued good supply with least stress exerted on local sources.
- 3 Provision of neighbourhood food composting facilities

Included files