

Statement on behalf of Dacorum Environmental Forum for the Examination of the Dacorum Development Plan Document October 2016.

Matter 2 – General matters

11. Has the principle of removing land from the Green Belt already been established in the CS? If so, does this Plan deviate from principles set out in the CS in this regard?

(From Development Plan Document Jan 2016)

6.24 Policies LA1-LA6 set out in more detail how the Local Allocations will be brought forward, identify key planning requirements, and establish new, defensible Green Belt boundaries. These policies are supported by site master plans which will help guide the form, timing and principles of development in each case. Requirements in the Site Allocations document will take precedence if there are variations between this and the corresponding requirements in the Core Strategy.

14. Are there any policies in the Plan that do not accord with the Framework or advice in Planning Practice Guidance?

The principle of removing land from the Green Belt must continue to be informed by clarification of the National Planning Policy Framework (NPPF), and this must be acknowledged in Para. 6.24. An example of such clarification is provided in the letter from Brandon Lewis MP Minister of State for Housing and Planning 7th June 2016 to colleagues, which was cited in the letter of 24th June 2016 from CPRE Herts. to the Chief Executives of Hertfordshire Local Planning Authorities. The following paragraph is an extract from Mr. Lewis's letter.

"The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries. "

With reference to Mr. Lewis's phrase "and with the support of local people", any claim to have this support in the case of LA3 has not taken into account the 1500-strong petition, organised by the Friends of Shrubhill Common and signed by over a thousand Chaulden and Warners End residents, opposing the loss of Green Belt status from the area referred to in the Dacorum Borough Local Plan (1991-2011) as West Hemel Hempstead. This was presented to the chairman of the Borough Plan Subcommittee of the Council on 30th September 1998, and officially received at the full Council meeting of 18th November.

Also in a letter from Brandon Lewis of July 11th forwarded to DEF Chair Gruff Edwards by Dacorum MP Mike Penning:

"We have made clear that constraints such as Green Belt may limit the ability of an authority to meet its housing needs in full. Indeed there have been instances when the Planning Inspectorate found a Local Plan sound even though not all local housing need would be addressed because of these constraints."

In 6.24 the phrase "new, defensible Green Belt boundaries" adds insult to injury to those who have campaigned over decades to defend the Green Belt against successive waves of encroachment, and to those planners and inspectors who have supported them, as the examples from earlier planning decisions quoted above demonstrate. We suggest something more honest such as "where exceptional circumstances have been proved, remove Green Belt status".