

Sample Members' Abridged Response E-mail

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' 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.

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

Q1. The exercise is flawed and overall the work by TRL has all the characteristics of a desk-top, tick box exercise. The assessments of individual sites are facile and lack any real analysis of the impact they may have on the specific area in which they are situated. The cumulative impact of development on several small Green Belt sites is ignored. Development on Green Belt cannot offer any net "environmental enhancements", the net effect can only be negative regardless of size and the larger the development the greater the negative effect.

Q2. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan

Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

Q8. The Core Strategy Settlement Hierarchy states "Hemel Hempstead will be the focus for housing development within the borough", while recognising that the Market Towns are "Areas of Limited Opportunity" and "The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs." This Settlement Hierarchy was ratified by the Core Strategy Inspector who concluded that "the Council's approach of focussing growth on Hemel Hempstead is justified." The Inspector points to "the sustainability credentials" of Hemel and contrasts that to the Market Towns where "The level of services and facilities is lower than at Hemel", while also confirming that "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town." The reality is that the first 10 years of the Core Strategy has seen development in Berkhamsted at a rate 34% above the target set, but with no infrastructure improvements to match, while development in Hemel is 21% below its target.

Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

Q12. Transport issues. Berkhamsted is a linear/valley Market Town with narrow streets. Options are limited.

Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This*

means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.

Q30. Social Infrastructure. Unrealistic assumptions. Reliant on other providers. Mental health and culture ignored.

Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.

Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the 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" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.