

Comments

Core Strategy Pre-Submission (26/10/11 to 07/12/11)

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 176 |
| Response Date | 07/12/11 12:19 |
| Consultation Point | 1.4 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 1.4

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG endorses the statistical data which underlies the housing figures for the borough as a whole. DBC's approach has integrity being based on census and ONS figures. DBC accept that numbers per household will decrease and their figures do take this in to account.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 178

Response Date 07/12/11 12:20

Consultation Point 1.8 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 1.8

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

In the view of BRAG the Settlement Hierarchy is eminently reasonable and supports DBC in resisting pressure from developers to remove Berkhamsted from the same classification as Tring and thus allow the town to be used as a "strategic development opportunity" . Berkhamsted and Tring are ancient market towns of a very different character from Hemel Hempstead, which is a Mark 1 New Town. Any infilling in Berkhamsted and Tring has to be handled with sensitivity because of the architectural heritage and lack of infrastructure to cope with large scale development, not to mention being virtually surrounded by Green Belt and the Chilterns AONB , which is of intrinsic value to wildlife and of great recreational value to residents and visitors. It is imperative to protect the nature and character of both Market Towns. This Settlement Hierarchy helps accomplish that aim.

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is understood that certain developers are pushing DBC to change the Settlement Hierarchy and specifically to re-classify Berkhamsted as a town that can be used in a larger supporting role to Hemel Hemstead. It is important that the views of Berkhamsted residents are considered.

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 180 |
| Response Date | 07/12/11 12:20 |
| Consultation Point | 1.13 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

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| To which part of the Core Strategy does your representation relate? | Paragraph |
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| Please specify the paragraph number and/or policy reference which you wish to comment on. | 1.13 (a) |
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(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

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| Are you (please tick one) | Objecting |
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Do you consider that the Core Strategy is legally compliant?

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|-----------------------------|-----|
| a) Legally Compliant | Yes |
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|-----------------|----|
| b) Sound | No |
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|---|--------------|
| Do you consider that the Core Strategy is unsound because it is not: | a) Justified |
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(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

While BRAG fully endorses the statement 'A second tier of market towns will meet their local housing needs', we believe the 1180 number of new homes for Berkhamsted is unsound and is excessive to meet the stated aim for the 'population to remain stable' in 8.9 Table 1.

As commented in 1.4, BRAG endorses the statistical data which underlies the housing figures and DBC's own figures show that Berkhamsted only requires 750 new dwellings to maintain the population up to 2031.

However, DBC's approach should be contrasted with figures put forward by the promoter of a site in South Berkhamsted, which DBC have already ruled out on good planning grounds. In these figures,

Berkhamsted's population baseline has been grossly inflated, thus taking estimates of housing need into the realms of fiction.

DBC should be confident in defending their calculations, which are robust being based on census and ONS figures, and the 750 target for new homes in Berkhamsted over the period 2006-2031. Contrary to a certain allegation, DBC have not taken into account windfall sites in the first ten years. In addition the actual number of houses in Berkhamsted in 2006 reasonably demonstrates that the true need is actually below 400 new homes. That plus the existence of a number of newly built vacant properties in the town provides robust evidence that 750 is actually erring on the side of caution with an in built safety net.

Given that the true need for Berkhamsted is no more 750 new homes the Green Belt local allocation at Hanburys will not be required and should be left out of the Core Strategy.

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

1.13 (a) should read:

Berkhamsted ? will have around 750 new homes. This includes the strategic site at Durrants Lane/Shootersway (Egerton Rothesay School), which will provide new homes, improvement to the school and additional playing pitches. Two ?education zones? have also been identified on the edge of the town to ensure the future primary age schooling needs are met. Existing employment land will be retained.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 181 |
| Response Date | 07/12/11 12:21 |
| Consultation Point | 1.17 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 1.17

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 182

Response Date 07/12/11 12:21

Consultation Point 1.18 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 1.18

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG fully supports this point.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 183

Response Date 07/12/11 12:22

Consultation Point 1.21 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 1.21

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG welcomes this statement and it is hoped that in future the Community Infrastructure levy and s.106 monies will indeed be paid, or designated buildings constructed: at national level it is acknowledged that in the past s.106 agreements did not deliver. BRAG is heartened by CS35. That the situation should be monitored is important, especially at a time of economic stringency, and it is important that the monitoring process has 'teeth'.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 184

Response Date 07/12/11 12:22

Consultation Point 3.5 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 3.5

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

Protection of Green Belt is of the utmost importance.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 185

Response Date 07/12/11 12:22

Consultation Point 3.2 Paragraph ([View](#))

Status Processed
Submission Type Web
Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 3.2

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

Not only do the majority of Dacorum residents live in Hemel Hempstead, DBC actively advertises the town as an attractive place for people and businesses to relocate to (see "Dacorum Borough and the case for relocation - Hemel Hempstead more than a magic roundabout...."), so it is logical that the growth in Dacorum will be centred in Hemel Hempstead.

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 186

Response Date 07/12/11 12:23

Consultation Point 3.12 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 3.12

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG believes that the statement "the proportion of residents working elsewhere is currently the lowest in the county, making Dacorum more 'self-contained' than the rest of Hertfordshire" is misleading in terms of Berkhamsted. A far greater proportion of people commute out of the area from Berkhamsted than they do from Hemel Hempstead which puts an excessive strain on transport links and parking in Berkhamsted and that needs to be considered when looking at section 21 Berkhamsted Place Strategy. Given that Berkhamsted does not offer much choice in employment, many more people commute. However, those in rush hour trains are crammed in, and there is no sign of the situation improving, while parked cars of commuters line the relatively narrow streets.

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

This paragraph should be split into towns, which would show that Hemel Hempstead may be more 'self-contained' but Berkhamsted has a much greater proportion of commuters.

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 187

Response Date 07/12/11 12:23

Consultation Point 3.15 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 3.15

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG agrees with DBC's 'age structure' and accepts that challenges DBC faces, while pointing out that ridge-top developments have to be avoided to fulfil the aim of "ensuring easy access to essential services and facilities."

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 188

Response Date 07/12/11 12:24

Consultation Point 3.21 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 3.21

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG endorses DBC's description of the borough and confirms that the residents of Berkhamsted greatly value the countryside and Green Belt surrounding the town. BRAG would add that the Green Belt and AONB that borders the town is either productive farmland, which is important for national food security, or woodland, contrary to one developer's allegation that land SE of Berkhamsted is "quasi-brownfield". There is also the pleasure of looking at historic buildings in a rural setting, such as the Grade 2* Ashlyns Hall. For the avoidance of doubt, not only a listed building but also its setting is protected under s.72 of 1990 Planning (Listed Buildings and Conservation Areas) Act. "Framing" such a building by a housing estate would be gross.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 189

Response Date 07/12/11 12:24

Consultation Point 3.22 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 3.22

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

See BRAG comment for 3.21 and it is worth adding that the abundance of wildlife in the Green Belt areas, which include badgers, kites, wild rabbits etc, give pleasure and offer quality of life to residents regardless of how common or not a species may be.

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 190

Response Date 07/12/11 12:25

Consultation Point 5.1 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 5.1

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG supports the vision and welcomes that Berkhamsted is treated with Tring and emphasises that Berkhamsted should not be used as an overflow or feeder town for Hemel Hemstead. Berkhamsted has its own distinct character and we welcome that DBC recognise and values this. Removing Berkhamsted from the same classification as Tring, as suggested by at least one developer, must continue to be rejected out of hand.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 191

Response Date 07/12/11 12:25

Consultation Point 6.2 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 6.2

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG supports the Strategic Objectives and would like to emphasise points 5, 6, 7 and 12.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 192 |
| Response Date | 07/12/11 12:25 |
| Consultation Point | 8.2 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Paragraph |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | 8.2 |

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG supports the sustainability objective but is worried that DBC will fail to comply if the infrastructure is not fixed before developments commence. Large developments in Berkhamsted would put excessive strain on the already deficient infrastructure in schooling, health care, water and sewage, transport, roads and parking etc. Hence leading to a worse quality of life for present residents while compromising the needs of future generations, as would the removal of land from the Green Belt - thus failing the sustainability test. See also BRAG submission to paragraph 21.1

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 193 |
| Response Date | 07/12/11 12:26 |
| Consultation Point | 8.7 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 8.7

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

The description of the Borough's diversity is supported, but BRAG challenges the assumption that all the towns need to adapt and grow to survive. Investment may be required to maintain existing settlements and infrastructure; growth is not essential. Some settlements may need to grow (such as Hemel Hemstead) but others do not and a generalised statement should not be applied to all settlements. Indeed, the settlement hierarchy in 8.9 Table 1 for 'Areas Of Limited Opportunity' such as Berkhamsted states that developments should enable "the population to remain stable".

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 195

Response Date 07/12/11 12:26

Consultation Point 8.8 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 8.8

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG supports the need to determine the appropriate scale of change to help ensure that existing character is protected and development takes account of environmental constraints. These constraints would rule out large developments in all but Hemel Hempstead.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)
Comment ID 196
Response Date 07/12/11 12:27
Consultation Point Table 1 Settlement Hierarchy ([View](#))
Status Processed
Submission Type Web
Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 8.9 Table 1

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG endorses the settlement hierarchy as laid out in Table 1. BRAG supports the identification of Hemel Hempsted as the main focus of strategic housing growth and emphasises the approach for areas of limited opportunity that "in these locations will be to support development that enables the population to remain stable". It is imperative that Berkhamsted remains classified alongside Tring as an area of limited opportunity in the settlement hierarchy, see BRAG's response to 1.8.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is understood that certain developers are pushing DBC to change the Settlement Hierarchy and specifically to re-classify Berkhamsted as a town that can be used in a larger supporting development role to Hemel Hempstead. It is important that the views of Berkhamsted residents are heard.

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 197 |
| Response Date | 07/12/11 12:27 |
| Consultation Point | Policy CS 1 Distribution of Development (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

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| To which part of the Core Strategy does your representation relate? | Policy |
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| Please specify the paragraph number and/or policy reference which you wish to comment on. | CS1 |
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(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

| | |
|----------------------------------|------------|
| Are you (please tick one) | Supporting |
|----------------------------------|------------|

Do you consider that the Core Strategy is legally compliant?

| | |
|-----------------------------|-----|
| a) Legally Compliant | Yes |
|-----------------------------|-----|

| | |
|-----------------|-----|
| b) Sound | Yes |
|-----------------|-----|

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG strongly supports POLICY CS1 for the Market Towns. Points (a) to (d) are essential elements in considering any new development on or around the Market Towns. BRAG refers back to 1.8 and 8.9 to stress that no change should be made Berkhamsted's classification as a market town alongside Tring.

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

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| If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? | Yes, I wish to participate at the oral examination |
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(**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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|---------------------------|--|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 198 |
| Response Date | 07/12/11 12:27 |
| Consultation Point | 8.14 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

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| To which part of the Core Strategy does your representation relate? | Paragraph |
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| Please specify the paragraph number and/or policy reference which you wish to comment on. | 8.14 |
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(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

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| Are you (please tick one) | Objecting |
|----------------------------------|-----------|

Do you consider that the Core Strategy is legally compliant?

| | |
|-----------------------------|-----|
| a) Legally Compliant | Yes |
|-----------------------------|-----|

| | |
|-----------------|----|
| b) Sound | No |
|-----------------|----|

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| Do you consider that the Core Strategy is unsound because it is not: | a) Justified |
|---|--------------|

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

While BRAG agrees that the effective use of existing land should be optimised it does not support extensions to settlement boundaries that would impact on the Green Belt. Given that there are sites with the benefit of planning permission which have yet to even commence construction in Berkhamsted, e.g. New Lodge, and the severity of the current economic downturn, care has to be taken not to over-allocate sites for new housing. Core strategies approved when the danger signs of the recession were ignored e.g. that of Dover District Council, have resulted in high grade agricultural land taken out of agricultural use (contrary to PPS7 and the Draft NPPF), idle building sites, and general planning blight.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

| | |
|---------------------------|---|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 199 |
| Response Date | 07/12/11 12:28 |
| Consultation Point | Policy CS 2 Selection of Development Sites (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

To which part of the Core Strategy does your representation relate? Policy

Please specify the paragraph number and/or policy reference which you wish to comment on. POLICY CS 2

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: b) Effective

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

While BRAG agrees with the majority of POLICY CS2, point (c) should be strengthened by adding "without compromising Government policy on Green Belt and protecting Green Belt for future generations."

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

The wording for (c) should be :

ensure the most effective use of land without compromising Government policy on Green Belt and protecting Green Belt for future generations

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

| | |
|--|--|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 200 |
| Response Date | 07/12/11 12:28 |
| Consultation Point | 8.22 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Paragraph |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | 8.22 |

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 202

Response Date 07/12/11 12:35

Consultation Point 8.23 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 8.23

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

See BRAG comments on paragraphs 3.21 & 3.22

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 203

Response Date 07/12/11 12:35

Consultation Point 8.24 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 8.24

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: b) Effective

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG considers that the section relating to Berkhamsted should be strengthened to ensure a clear boundary is maintained between the town and the A41.

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Suggested wording:

Berkhamsted ? to prevent coalescence of Berkhamsted with Bourne End, Dudswell and the A41 and retain the town?s unique valley setting.

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 204

Response Date 07/12/11 12:38

Consultation Point 8.29 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 8.29

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

While BRAG endorses the statement that "A strategic review of Green Belt boundaries is not required" it refutes the need for any Green Belt releases in Berkhamsted. See comments on 1.13 (a) regarding projected housing needs in Berkhamsted.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 205 |
| Response Date | 07/12/11 12:38 |
| Consultation Point | 8.30 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Paragraph |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | 8.30 |
| (For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.) | |
| Are you (please tick one) | Objecting |
| Do you consider that the Core Strategy is legally compliant? | |
| a) Legally Compliant | No |
| b) Sound | No |
| Do you consider that the Core Strategy is unsound because it is not: | b) Effective |
| (If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments). | |
| Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible. | |
| This paragraph is compromised by the wording. Inappropriate development can never be appropriate by definition. | |

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

A single sentence will suffice and is appropriate:

The Green Belt will be protected from inappropriate development in accordance with national policy and remain essentially open in character.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

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|---------------------------|--|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 206 |
| Response Date | 07/12/11 12:38 |
| Consultation Point | 9.11 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

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| To which part of the Core Strategy does your representation relate? | Paragraph |
|--|-----------|

| | |
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| Please specify the paragraph number and/or policy reference which you wish to comment on. | 9.11 |
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(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

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| Are you (please tick one) | Objecting |
|----------------------------------|-----------|

Do you consider that the Core Strategy is legally compliant?

| | |
|-----------------------------|-----|
| a) Legally Compliant | Yes |
|-----------------------------|-----|

| | |
|-----------------|----|
| b) Sound | No |
|-----------------|----|

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| Do you consider that the Core Strategy is unsound because it is not: | b) Effective |
|---|--------------|

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

There is insufficient detail and BRAG would point out that traffic and parking is a major problem for existing residents and businesses in Berkhamsted without any further development. What is needed is a comprehensive transportation plan, catering for all sectors of the community and all modes of transport. It is unclear whether the Berkhamsted Urban Transport Plan would fill the bill but in any case, it is not scheduled to start until 2012 which does not synchronise with the development of the Strategic Housing Site.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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|--|--|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 207 |
| Response Date | 07/12/11 12:39 |
| Consultation Point | 14.6 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Paragraph |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | 14.6 |

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

In terms of Berkhamsted, BRAG fully supports DBC's findings in the updated SHLAA. In comparison, alternative reports commissioned by developers are based on unsound assumptions, including the ability to widen narrow roads when it is not feasible, ignoring site topography and reclassifying pure Green Belt land containing protected historic landmarks as "quasi-brownfield".

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

| | |
|--|--|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 208 |
| Response Date | 07/12/11 12:39 |
| Consultation Point | 14.9 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Paragraph |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | 14.9 |

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

Refer to BRAG submission for paragraph 1.4

| | |
|---------------------------|--|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 209 |
| Response Date | 07/12/11 12:40 |
| Consultation Point | 14.20 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

| | |
|--|-----------|
| To which part of the Core Strategy does your representation relate? | Paragraph |
|--|-----------|

| | |
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| Please specify the paragraph number and/or policy reference which you wish to comment on. | 14.20 Table 8 |
|--|---------------|

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

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| Are you (please tick one) | Objecting |
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Do you consider that the Core Strategy is legally compliant?

| | |
|-----------------------------|-----|
| a) Legally Compliant | Yes |
|-----------------------------|-----|

| | |
|-----------------|----|
| b) Sound | No |
|-----------------|----|

| | |
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| Do you consider that the Core Strategy is unsound because it is not: | a) Justified |
|---|--------------|

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG considers the number of houses allocated to Berkhamsted to be excessive to maintain population stability as stated as an aim in 8.9 Table 1. See also BRAG submission for paragraph 1.13 (a).

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

The entry for Berkhamsted in Table 8 should read 750.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

| | |
|---------------------------|--|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 210 |
| Response Date | 07/12/11 12:40 |
| Consultation Point | 14.21 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 14.21 Table 9

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG submits that the housing figures proposed for Berkhamsted are excessive to sustain population stability (see BRAG submission 1.13 (a) and 8.9 Table 1). DBC's own figures suggest 750 dwellings is correct for Berkhamsted and as such Hanburys should be removed and the proposed housing density at Durrants Lane / Shootersway strategic site should be adjusted to be sympathetic to surrounding housing densities.

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Remove Hanburys from the table completely and adjust housing numbers for Durrants Lane / Shootersway strategic site to be sympathetic to surrounding housing densities.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

| | |
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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 211 |
| Response Date | 07/12/11 12:40 |
| Consultation Point | Policy CS 23 Social Infrastructure (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Policy |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | POLICY CS 23 |

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG would endorse Policy CS23. Social Infrastructure is under considerable pressure in Berkhamsted now. It is a fact that prospective developers cannot be asked to cater for existing deficiencies (DoE Circular 11/95 Conditions). Primary Care provision is being reviewed: this is an identified need within the local community. Current lack of schooling is acute and a review of the schooling system is underway. School buildings are regrettable in Green Belt but the Core Strategy is the appropriate stage in the development plan cycle to argue the case. On the other hand their playing fields would do much to protect it for the foreseeable future. It is to be hoped that in future the Community Infrastructure Levy and s.106 monies will indeed be paid, or the designated buildings constructed: at a national level it is acknowledged that in the past s.106 agreements did not deliver.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 212

Response Date 07/12/11 12:41

Consultation Point 21.1 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.1

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG endorses DBC's view of Berkhamsted. It is important to stress that it is a valley town of linear nature rising steeply to the ridge tops. The linear nature of the town, the steepness of the valley sides, the dense character of the settlement and the narrowness of all the roads, apart from the A4251, militates against finding space for any infill whatever. More development means more traffic, destruction of habitat, land sealed against rainwater, and yet more sewerage. As it is rainwater pours down the hills causing flash floods and it is not unknown for sewerage to overwhelm gardens in the valley. The hills are also a major deterrent to sustainable modes of transport such as walking and cycling. Although the shops would no doubt benefit from more trade, there are severe parking restrictions for any shoppers: the High Street struggles with the sheer number of cars and vans. Given that Berkhamsted does not offer much choice in employment, many people commute. However, those on rush hour trains are crammed in and there is no sign of this situation improving. Unfortunately, it is not realistic for DBC to refuse to entertain any new housing allocation in Berkhamsted in the period 2006-31: it is a matter of minimising it.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

| | |
|--|--|
| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 213 |
| Response Date | 07/12/11 12:41 |
| Consultation Point | Statement Vision 4 (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Paragraph |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | 21.1 Statement Vision 4 |

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

- a) Legally Compliant Yes
- b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

While BRAG supports the overall vision, it must be noted that to promote non car use ridge top developments have to be avoided.

With regard to the local objectives BRAG considers the number of houses (1180) to be excessive to maintain population stability - see BRAG responses to paragraphs 1.13 (a) and 8.9 (Table 1).

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Bullet point one should read:

Provide around 750 new homes between 2006 and 2031.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 214 |
| Response Date | 07/12/11 12:42 |
| Consultation Point | 21.2 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.2

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG considers the number of proposed houses (1180) to be inflated. See BRAG submissions for paragraphs 1.13 (a), 8.9 (Table 1) and 21.1

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Reduce number of homes to 750.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 215
Response Date 07/12/11 12:42
Consultation Point 21.3 Paragraph ([View](#))
Status Processed
Submission Type Web
Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.3

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG submits that the housing figures proposed for Berkhamsted are excessive to sustain population stability (see BRAG submission 1.13 (a) and 8.9 Table 1). DBC's own figures suggest 750 dwellings is correct for Berkhamsted and as such the proposed housing density at Durrants Lane / Shootersway strategic site should be reflecting surrounding housing densities, while Hanburys should be removed. Hanburys should also be removed on Green Belt considerations.

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Remove Hanburys as a local allocation site and adjust housing numbers for Durrants Lane / Shootersway strategic site to be sympathetic to surrounding housing densities.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 216

Response Date 07/12/11 12:42

Consultation Point 21.4 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.4

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

School buildings are regrettable in Green Belt but the Core Strategy is the appropriate stage in the development plan cycle to argue the case and the current educational review may alter the need for new buildings.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 217 |
| Response Date | 07/12/11 12:43 |
| Consultation Point | 21.6 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.6

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG fully endorses DBC's comments. It would add that the Green Belt and AONB that borders the town is either productive farmland, which is important for national food security, or woodland, contrary to one developer's allegation that land to the SE of Berkhamsted is 'quasi-brownfield'.

There is also the pleasure of looking at historic buildings in a rural setting, such as the Grade 2* Ashlyns Hall. For the avoidance of doubt, not only a listed building but also its setting is protected under s.72 of the 1990 Planning (Listed Buildings and Conservation Areas) Act. 'Framing' such a building by a housing estate would be gross.

Furthermore Berkhamsted is an historic Market Town. Any infilling has to be handled with sensitivity because of the architectural heritage and lack of infrastructure to cope with large scale development, not to mention being virtually surrounded by Green Belt and the Chilterns AONB, which is of intrinsic value to wildlife and of great recreational value to residents and the broader population.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 218

Response Date 07/12/11 12:43

Consultation Point 21.7 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.7

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

Maintaining a clear boundary between town and country is important too for wildlife. BRAG endorses the designation of green corridors in the Berkhamsted Vision Diagram: such routes are important for the migration, dispersal and genetic exchange of species in the wider environment? (PPS9 & Draft NPPF). A whole range of protected and common species raises the quality of life for local residents. DBC is right to avoid selecting a site in SE Berkhamsted for residential development near the A41. Although the road is in a cutting, the traffic noise is considerable. Air pollution could be a significant factor under some conditions.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 219 |
| Response Date | 07/12/11 12:44 |
| Consultation Point | 21.9 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Paragraph |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | 21.9 |
| (For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.) | |
| Are you (please tick one) | Supporting |
| Do you consider that the Core Strategy is legally compliant? | |
| a) Legally Compliant | Yes |
| b) Sound | Yes |

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG notes that public car parking is already over stretched and the limited amount of additional space at the proposed new supermarket will have little impact on the current deficiencies. As a linear town in a narrow valley there is already congestion and there are limited opportunities for expansion of parking in the town centre.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 220 |
| Response Date | 07/12/11 12:44 |
| Consultation Point | 21.13 Paragraph (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.13

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: b) Effective

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

While BRAG supports the comment "careful location of new development and promoting opportunities for sustainable travel" BRAG considers it is not sufficiently specific in addressing the issues for Berkhamsted. BRAG would point out that promoting ?sustainable transport options? can be tried but achievement of the objectives is another matter.

BRAG would query the effectiveness of plans to deal with the traffic from the Egerton Rothsay strategic site. A Green Travel Plan for the school?s transport would in itself generate coach and bus traffic which would impede other modes of wheeled transport down to the High Street. The strategic housing allocation would generate an additional 1260 vehicle movements per day (allowing 7 movements per house), 10% of which would be in rush hour, which would coincide with travel to the school. The same would apply to any other ridge top site.

The topography of any ridge development would act as a major deterrent to cycling and walking for all but the fittest members of the community. Therefore it is imperative that a bus service is laid on for the housing and leisure use which is *commercially viable in the long term* : all too often bus services terminate after the expiry of the first five years of the s.106 agreement because they attract insufficient *paying* passengers. In these days of financial stringency when LPA?s are reviewing concessionary fares, even pensioners are likely to resume driving if the concession is removed. There is nothing in the Core Strategy which demonstrates how exactly this fundamental problem will be solved in terms of finances and commercial partners, let alone ?in advance of or alongside the development? as promised by CS53.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents? views are heard when considering planning decisions that will affect their environment and quality of life.

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 221 |
| Response Date | 07/12/11 12:44 |
| Consultation Point | Table SS1 Strategic Site Shootersway/Durrants Lane. (View) |
| Status | Processed |
| Submission Type | Web |
| Version | 0.1 |
| To which part of the Core Strategy does your representation relate? | Paragraph |
| Please specify the paragraph number and/or policy reference which you wish to comment on. | 21.14 Table SS1 Strategic Site Shootersway/Durrants Lane |

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG welcomes in part the proposals.

With regard to the Egerton Rothsay School, it should be borne in mind that although this is a private school, it offers valuable education for children with specific educational needs aged 5 -16, this includes educating "statemented" children. It is a facility available for the wider community and therefore BRAG welcomes the prospect of improvement both educationally and in terms of leisure facilities.

However, this should not be at the expense of over development. BRAG submits that DBC's own figures point to 750 homes being required to maintain a stable population (see BRAG response to 1.13 (a) and 8.9 Table 1), which would allow the SS1 site to be developed in sympathy with surrounding housing density.

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Adjust housing numbers for Durrants Lane / Shootersway strategic site to be sympathetic to surrounding housing densities.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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| Comment by | Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge) |
| Comment ID | 222 |
| Response Date | 07/12/11 12:45 |
| Consultation Point | Table LA4 Local Allocation. Land rear of Hanburys. (View) |
| Status | Processed |
| Submission Type | Web |

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.14 Table LA4 Local Allocation. Land rear of Hanburys

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: a) Justified

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG submits that DBC's own figures point to 750 homes required to maintain a stable population (see BRAG response to 1.13 (a) and 8.9 Table 1), which would allow the LA4 site (Hanburys) to be removed from the Core Strategy. Hanburys is also in Green Belt and BRAG maintains that Green Belt should not be compromised.

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Remove LA4 Local Allocation. Land rear of Hanburys from the Core Strategy.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)
Comment ID 223
Response Date 07/12/11 12:45
Consultation Point Figure 23 ([View](#))
Status Processed
Submission Type Web
Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 21.14 Figure 23

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG supports the maintenance of the Berkhamsted settlement boundary and considers all additional housing should be within those boundaries.

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 224

Response Date 07/12/11 12:46

Consultation Point 18.30 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 18.30

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Supporting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound Yes

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

BRAG also notes that that development of ridge top locations results in land sealed against rain water with resulting affects on the level of rainfall left to recharge groundwater sources.

(**Please note** representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 225

Response Date 07/12/11 12:46

Consultation Point 18.34 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Paragraph

Please specify the paragraph number and/or policy reference which you wish to comment on. 18.34

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: b) Effective

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

The 'Water Cycle Study Scoping Report (35)' referred to is not effective because it does not identify how the current problems will be addressed before development increases deficiencies. For Berkhamsted it states that "the Waste Water Treatment is currently operating close to its discharge consent and there are water quality concerns to the discharge being to the GUC."

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Expand to explain how deficiencies are going to be addressed prior to any development.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

Comment by Berkhamsted Residents Action Group (BRAG) (Mr Antony Harbidge)

Comment ID 201

Response Date 07/12/11 12:34

Consultation Point Policy CS 17 New Housing ([View](#))

Status Processed

Submission Type Web

Version 0.1

To which part of the Core Strategy does your representation relate? Policy

Please specify the paragraph number and/or policy reference which you wish to comment on. POLICY CS 17

(For help answering these questions please refer to the Explanatory Notes under the 'Supporting Documents' section.)

Are you (please tick one) Objecting

Do you consider that the Core Strategy is legally compliant?

a) Legally Compliant Yes

b) Sound No

Do you consider that the Core Strategy is unsound because it is not: b) Effective

(If you wish to support the legal compliance or soundness of the Core Strategy, please also set out your comments).

Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

CS17 needs clarification as the wording does not agree with explanations within DBC document "Housing Land Availability Paper July 2011"

(Your response should have regard to the test that you have identified above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.)

Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Clarrification required.

(Please note representations made in writing carry the same weight as those made via the oral examination).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

(**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

It is important that residents' views are heard when considering planning policy that will affect their environment and quality of life.