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DACORUM ISSUES AND OPTIONS CONSULTATION

CPRE Hertfordshire will publish a full answer to Dacorum Borough Council’s Issues and Options Consultation for their new Local Plan. In the meantime, a summary list of bullet points is provided below. Please note that the response to this consultation should comprise comments and ideas for the Council to consider rather than an objection. Be sure to reference all your comments in relation to specific Questions being posed by the Council, wherever possible.

The new vision for Dacorum 2036 is supported, including that “Local housing needs have been met, with the impact on the countryside minimised through making effective use of previously developed land in the towns and villages”, provided this is compatible with national policy for protection of the Green Belt. However, the overriding emphasis in the consultation is on the development of greenfield sites in the Green Belt to meet one of the growth options.

Simply adding sites to a brownfield register is not an active way of considering options for housing development. Only one brownfield regeneration site, in Hemel Hempstead, is mentioned in the consultation document. On page 35 there is a link to a ‘Call for Sites’ form.

ACTION: complete the Call for Sites form for any brownfield sites or regeneration proposals you think Dacorum should consider along with the Large Green Field sites that have been assessed. (Question 4 and Question 11)

There is no explicit sustainable objective of minimising the impact on the countryside, most of which is Green Belt. The restriction on development in the Green Belt, except in exceptional circumstances is not stressed enough. It is Green Belt that allows the Borough’s settlements and countryside to retain their individual and special character in the face of pressure for development.

ACTION: Highlight this shortfall and request an additional sustainable objective. (Question 6)

Minimising the loss of Green Belt land to development must be a priority for the new Local Plan because this is a national Planning policy priority as restated recently by the Government. The proposed approach to Green Belt set out in paragraph 5.2.2 of the document, of trying to balance the two conflicting requirements; of planning for enough sustainable development to meet the future

needs of Dacorum; and protecting the Green Belt from most types of development. This approach is incorrect because housing need alone is not an “exceptional circumstance” which would justify loss of Green Belt Land.

ACTION: Dispute the approach to the Green Belt set out in the document. (Question 9)

Whilst the outcome of the consultation on the right approach to calculating housing need is pending, it is difficult to support or reject any one housing target. Unmet housing need for London should be considered first on brownfield land in London and then beyond the London Green Belt in a properly planned growth area, not in Dacorum. Whatever the figure used as a starting point, it is most important that all the constraints on providing for housing need are properly assessed.

ACTION: Promote the approach of considering the constraints on providing for housing need, including safeguarding Green Belt, as the primary consideration rather than choosing a housing target. (Question 16)

The proposed locational approach to providing for future jobs growth includes the allocation of three sites in the Green Belt: South west of Kings Langley for office development (as a reserve if insufficient new offices space is built at the Green Lane site at Hemel Hempstead); and east of the A41 at Two Waters and Dunsley Farm in Tring for industrial and warehousing. The Council considers that the need for additional employment land justifies the loss of Green Belt. The need for jobs is not an “exceptional circumstance” to justify using Green Belt land for employment use.

ACTION: Refute the part, of the proposed approach to choosing sites to accommodate future jobs growth, which includes the loss of three Green Belt sites

Finally in this summary, the Council’s proposed ‘Locational Principles’ are listed in paragraph 10.2.4. One of the most important locational principles is missing. The last (or even the first) of these principles should be ‘Develop Green Belt land only for appropriate uses or where “exceptional circumstances” permit it.’

ACTION: Request an additional locational principle along the lines of that suggested above, highlighting the importance of the Green Belt in Dacorum. (Question 36)

END