

Our colleagues in BRAG – have created this very helpful document which I am sure will assist you.

Section (3)

Borough Vision – The Council’s Vision is one we would all sign up for: a world with plenty of good homes and jobs, excellent education and health, sustainable transport systems, carbon neutral and the environment and natural resources protected. The reality is that in essence the draft Plan is about how many new homes will be built and where they are to be located. The Council decided to accept what they believe to be a Central Government requirement to build 16,596 new homes over the next 18 years, 922dpa (dwellings per annum), without challenge or resistance. This is an increase of 492dpa or 114% over the 2013 Core Strategy, the current plan. They have assessed how many homes can be built in urban areas-10,954 and asked landowners and developers where the rest can go. The result is 5,954 homes will be in "greenfield growth areas" which to all but the Council is known as Green Belt and most of it on the outskirts of Berkhamsted and Tring. In arriving at this position the Council have ignored national Planning Policy contained in the NPPF and statements by Ministers including the PM that Green Belt should not be developed except in ‘exceptional circumstances’. The Council makes no effort to explain what the exceptional circumstances are in this Borough. The Council’s proposals are neither justifiable or sustainable and this is the core of our opposition to this draft Plan. DBC should revert to the Core Strategy vision statement.

(4)

Sustainable Development in Dacorum – nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning

(5)

Spatial Strategy for Growth sets out the number of homes to be built and where to be located – excluding windfalls, 64% will be on Green Belt (77% on Greenfield), including 2200 at Berkhamsted of which 80% will be on new Green Belt releases. DBC has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target (plenty of examples where Gov state it is not a target) and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.

(6)

DBC should retain the Core Strategy Settlement Hierarchy as the revamped one fails to protect the historic character and setting of Berkhamsted by facilitating a 24% increase in dwellings and 31% increase in urban footprint through the release of Green Belt.

(7)

Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed

handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.

(8)

Employment strategy – there is no employment strategy for Berkhamsted, so the growth will accommodate out of town workers.

(10)

Delivering Infrastructure to support growth – the IDP fails to adequately address issues, including traffic, water and wastewater, and is incomplete which reflects the reality that infrastructure always lags the development it is meant to serve. This is very obvious in Berkhamsted.

(14)

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

(17)

Climate Change and sustainability – has very little climate change and sustainability credentials as highlighted by CPRE Herts published concerns.

(21)

Sustainability Transport Connectivity – Berkhamsted has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.

(22)

Healthy Communities – taking away Green Belt robs the community of an important health resource and farm land that contributes food supply stability.

(23)

Delivery Strategy – flawed windfall calculations and projections leads to a faulty delivery strategy that prioritises building on Green Belt, especially surrounding Berkhamsted and Tring, over brownfield and urban development (contrary to NPPF), while holding back the bulk of the Hemel Garden Communities allocation for after the Plan is illogical. The Berkhamsted Delivery Strategy is clearly developer led and offers no protection to Green Belt or infrastructure improvements for issues that already exist.

(24)

This section gives details of all the individual sites proposed for development in the Borough. Berkhamsted sites start at Bk01 South Berkhamsted. They are all basically valley sides (with gradients of up to 1:11) and ridge-top Green Belt locations and cannot be regarded as sustainable locations.

(27)

National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.

Thank you BRAG.