

Appendix 6
Question 35 to
Question 38

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	316
Filtered Respondents	307
Questions	<p>Question 35</p> <p>Has the Council considered all reasonable alternative levels of growth?</p> <p>Yes / No</p> <p><i>If no, please explain your reasons, with reference to evidence where available.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	ID-4764271-QUESTION-35
Pivot	<i>(none)</i>
Document Name	Question 35 - Summary Report
Created on	2019-04-23 09:29:24
Created by	Strategic Planning Admin

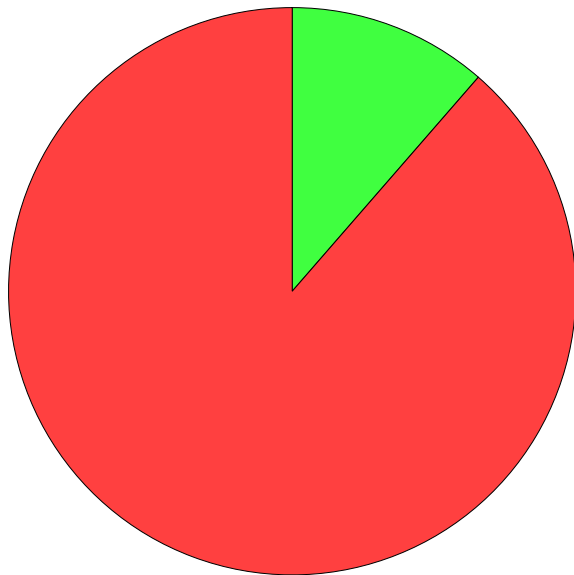
Your Opinion

Question responses: **316 (100.00%)**

Question 35

Has the Council considered all reasonable alternative levels of growth?

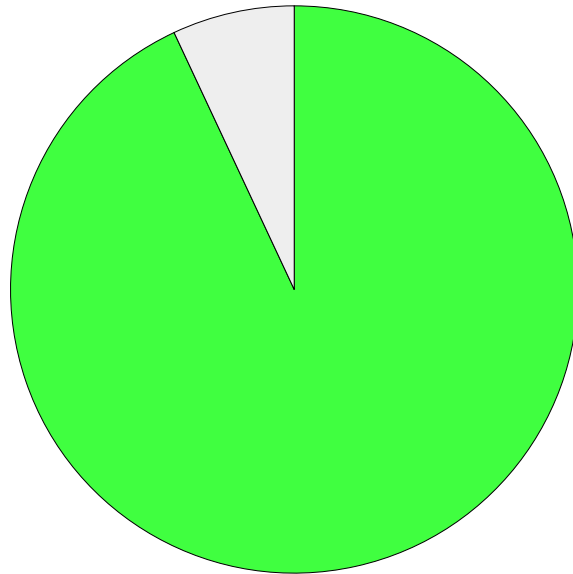
Yes / No



	% Total	% Answer	Count
■ Yes	11.39%	11.39%	36
■ No	88.61%	88.61%	280
Total	100.00%	100.00%	316

Responses

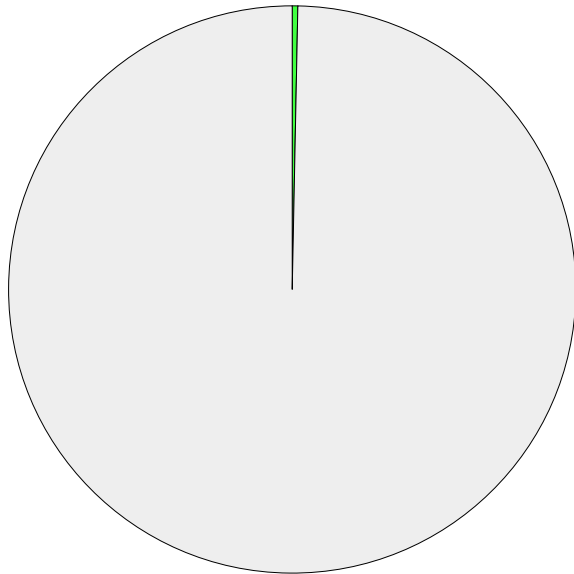
Question responses: **294 (93.04%)**



	% Total	% Answer	Count
Responses	93.04%	100.00%	294
No Response	6.96%	--	22
Total	100.00%	100.00%	316

Supporting evidence

Question responses: 1 (0.32%)



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	0.32%	100.00%	1
■ Responses with No Uploads	99.68%	--	315
Total	100.00%	100.00%	316

Issues and Options All Responses to Question 35

Number	Question 35
ID	LPIO24
Full Name	Mrs Jennifer Ponsford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO57
Full Name	Mr Derin Mellor
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Why has Bovingdon Airfield which is effectively brown field not been considered?</p> <p>It has a full junction on the A41 that could easily be expanded - this would give direct access to Hemel and M25.</p>
Include files	
Number	Question 35
ID	LPIO102
Full Name	Mr John Lilley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	See what happens to demand after we get control of our borders back.
Include files	
Number	Question 35
ID	LPIO196

Full Name	Mr Andrew Levy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Agree with Derin Mellor: Why has Bovingdon Airfield which is effectively brown field not been considered? It has a full junction on the A41 that could easily be expanded - this would give direct access to Hemel and M25.
Include files	
Number	Question 35
ID	LPIO302
Full Name	Ms Jane Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO350
Full Name	Mr David Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO480
Full Name	Mr Robert Spence
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO687
Full Name	Mr David Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes although I note the comment from others about Bovingdon airfield brown field site not being considered
Include files	
Number	Question 35
ID	LPIO740
Full Name	Mr John Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I struggle with the numbers, they appear just to be plucked out of thin air. In the Autumn addition of Horizon, the Hertfordshire County Council news magazine circulated to all homes in Hertfordshire on pages 16 and 17 they state a provision of 9,581 homes in Dacorum, 32,271 homes in SW Hertfordshire including Dacorum and 91,224 homes in the whole of Hertfordshire. These figures are considerably lower than any of the three options given to us for comment and support the 430 homes/year senario.</p> <p>The council is to quick in accepting higher growth rates prepared by 'Consultants' who historically are invariably incorrect.</p> <p>Development must be at a controlled speed to monitor demand and there must be no upper limit that requires development on any Green Field sites in the borough. I again refer you to the recent statements of the Chancellor of the Exchequer and Mayor of London ruling out Green Field development.</p>
Include files	

Number	Question 35
ID	LPIO825
Full Name	Mrs Karen Bevan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Higher figures are, I believe taking into account the 'need' to build homes for other than local people and which will be unaffordable for local people.
Include files	
Number	Question 35
ID	LPIO871
Full Name	Mr Stephen Bevan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I believe the higher house building figures are only necessary to satisfy demand from outside the local area of Berkhamsted and this is making prices unaffordable for local people.
Include files	
Number	Question 35
ID	LPIO941
Full Name	Ms Stephanie Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Bovington Airfield and empty properties, especially empty commercial properties should be considered first.
Include files	
Number	Question 35
ID	LPIO1025
Full Name	Mr Dominic Lawrance
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	None of these housing needs models seem to take any account of the effect on demand of Brexit, if/when it happens. It would be rash to assume that the population in south-eastern England will continue to grow as it has done in the last few decades.
Include files	
Number	Question 35
ID	LPIO1026
Full Name	Mr Dominic Lawrance
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	None of these housing needs models seem to take any account of the effect on demand of Brexit, if/when it happens. It would be rash to assume that the population in south-eastern England will continue to grow as it has done in the last few decades.
Include files	
Number	Question 35
ID	LPIO1154
Full Name	Mrs Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO1283
Full Name	Sarah Harper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are other options. Zero is unrealistic but lower than proposed based on actual supply of suitable sites outside of the Greenbelt could be a target.
Include files	
Number	Question 35
ID	LPIO1303
Full Name	Mrs Angela Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I would like to see evidence of assessment of all brownfield sites before spoiling our villages and small towns. Hemel Hempstead is a new town, totally able to support new areas of growth, and if the developers don't want to build there, ask for tenders from those who will.
Include files	
Number	Question 35
ID	LPIO1336
Full Name	Mrs Catherine Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You mention choosing areas not at risk of flooding. Bovingdon floods every year in the High Street and along green lane. It is mentioned that areas considered for development would have all the necessary infrastructure in place. Neither Bovingdon or Kings Langley would have the infrastructure in place for such a high volume of new housing. It is mentioned that the council would like to protect the character of important landscapes. By building houses in villages you are completely changing the character and landscape of villages
Include files	
Number	Question 35
ID	LPIO1412
Full Name	Mr Matt Clarke

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Because you have not considered all Brownfield sites and are trying to steam roller Green Belt development. Sites identified in previous local plans have been ignored which could accommodate the majority of housing need required for Kings Langley. If you have done this here, how can you give the residents of Dacorum any guarantee that you have considered all sites across the borough?</p> <p>Green Belt development is not to be undertaken on a whim or as an easy option. You have failed in your site identification in part of the Borough and I have no confidence that consequential testing has been rigorously undertaken within the whole of Dacorum.</p>
Include files	
Number	Question 35
ID	LPIO1510
Full Name	Mr Chris Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	All areas in Hemel should be built on in the first instance.
Include files	
Number	Question 35
ID	LPIO1637
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But the Council has not considered the rejected options properly.
Include files	
Number	Question 35
ID	LPIO1697

Full Name	Mr Wayne Hill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	How about we fill the empty properties in Dacorum first, before considering building more estates
Include files	
Number	Question 35
ID	LPIO1715
Full Name	Ms G Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO1815
Full Name	Mrs Pamela Kingsland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO1820
Full Name	Mrs Pamela Kingsland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	

Include files	
Number	Question 35
ID	LPIO1929
Full Name	ms V Earle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Lower levels should be considered
Include files	
Number	Question 35
ID	LPIO1972
Full Name	Mr Robert Emberson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But the proposals do not appear to adhere to the principles. Development is not on Brownfield sites and by developing Green Belt farmland does not maintain the character of existing settlements. Also with regard to Site Tr-h1 at Station road Tring, as Mrs Ward has pointed out the land near Ivy Cottage has in recent years been subject to extensive flooding& on occasion has severely flooded across station road to the land on the opposite side. On looking on the Cranfield Soil & Agrifood Institute Soilscape Map this land is indicated in blue as Soilscape 20, "loamy & clayey floodplain soils with naturally high groundwater". These soils continue along the Bulbourne valley to Cow Roast which also regularly floods.
Include files	
Number	Question 35
ID	LPIO2079
Full Name	Mr Christopher Giddings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Population growth in kings langley over the past 10 years has been 2.8% according to the 2001 and 2011 census. The council has not made it clear why such significant new housing is needed in the village when historic growth has been limited. The largest scale development would add almost 3000 houses to Kings langley, more than doubling its size from a 2011 level of 2,135 dwellings.
Include files	
Number	Question 35
ID	LPIO2207
Full Name	Mrs Karen Mellor
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I agree with all of the comments made previously on this question.</p> <p>I do not agree that the three growth levels proposed are reasonable. The infrastructure capacity in the villages and smaller towns are beyond any improvement. The only way we could comply with the environmental objectives for sustainability set out in this Plan currently and in the Core Strategy would be for people to only be allowed one car per family, for starters, For everyone to buy a bike and cycle where they can (oh of course, I forgot, we have no decent cycle network) or for everyone to start using the public bus network (oh, of course, I forgot, it's more expensive to use the bus than it is to park ones car - how did that ever become a thing!!!!). And, for car sharing to take off.</p> <p>Regarding Option B. You say "Benefits may include the ability to pool financial contributions from new development, so that they enable major changes to the New Town infrastructure, which is in need of improvement and renewal. Major changes would however be required to the town's road network, which transport modelling indicates is already almost at capacity. "</p> <p>REALLY!! Firstly, it does not appear to me that "financial contributions from new development" are ever enough to provide for the objectives set out in this Plan or the Core Strategy. Our safe cycle network for future-proofing our transport in light of uk carbon reduction targets is largely non-existent. Secondly, if they think transport modelling in Hemel New Town is "almost at capacity" goodness knows what it would show for all the small villages, Tring and Berkhamsted. They must be far beyond capacity.</p> <p>If Oversupply could be an issue which could cause land banking then I would for one, question your figures for</p>

	the necessity of so many homes. As someone has already said, compulsory purchase would be the way forward. That way the Borough Council could stipulate the type of construction that needs to take place rather than being at the mercy of the developer.
Include files	
Number	Question 35
ID	LPIO2344
Full Name	Mr George Bull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have seen no evidence that DBC has reduced the anticipated level of new housing starts to reflect:</p> <ol style="list-style-type: none"> 1 the pipeline of sites in respect of which residential planning permission has already been given 2 the significant impact of Brexit on net immigration, and therefore on housing need.
Include files	
Number	Question 35
ID	LPIO2449
Full Name	Dr Nick Hodsdon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The council have only considered "available" sites. There should be powers in place to ensure suitable brownfield sites can be developed before considering any greenfield sites.</p> <p>I'm sure I would not be the only one supporting the use of council funds to encourage or even subsidise such a policy, providing any development was maintained at a sustainable level.</p>
Include files	
Number	Question 35
ID	LPIO2685
Full Name	Mr Alan Andrews
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Consider brown field sites and other areas in Hemel Hempstead.
Include files	
Number	Question 35
ID	LPIO2890
Full Name	Mr Antony Harbidge
Company / Organisation	Berkhamsted Residents Action Group (BRAG)
Position	Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • Have not considered the rejected options properly. • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated

	<p>will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO3104
Full Name	mr hugh siegle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As per q 34
Include files	
Number	Question 35
ID	LPIO3448
Full Name	Mrs Ann Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	More work is needed to identify brownfield sites and cross boundary cooperation o housing numbers in

	specific areas like Kings Langley if overdevelopment is not going to occur.
Include files	
Number	Question 35
ID	LPIO3734
Full Name	Mr Andrew Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO3839
Full Name	Mr Robin Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Presumably these growth estimates were calculated a while ago, before Brexit. If we are just accommodating people who have been forced out of London because of the bedroom tax, these people are used to living in towns and won't care that we are being merged with Watford and Hemel in Kings Langley, because they are used to being in towns.
Include files	
Number	Question 35
ID	LPIO3849
Full Name	Mr Anthony Warren
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Lack of push back to the government, suggesting more homes should be built in the north using the HS2 instead of building near to London.
Include files	

Number	Question 35
ID	LPIO3856
Full Name	Mrs Suzette Phair
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Effort should be taken to identify suitable sites and approach landowners rather than just adopt green belt sites being put forward.
Include files	
Number	Question 35
ID	LPIO3890
Full Name	Miss D Bryant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am confused where do housing figures come from? I attended a Dacorum Council meeting in November one point raised; There are 10,000 people on the Dacorum Housing Register yet only 2,000 are actively looking for properties, we were asked how Dacorum should go about investigating the 8,000 to get an accurate figure?
Include files	
Number	Question 35
ID	LPIO4161
Full Name	Mr Peter Howard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I find the arguments in favour of your proposed option unconvincing
Include files	
Number	Question 35
ID	LPIO4260
Full Name	Ms Alison Sams

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Because you have not considered all Brownfield sites which are the only option appropriate and are trying to decimate the Green Belt
Include files	
Number	Question 35
ID	LPIO4285
Full Name	Mr Alan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>DBC needs to do more than a desk top exercise to identify all the other options that are available to it BEFORE considering any Green Belt sites. At the consultation event at Kings Langley Cricket Club it was acknowledged that, for example, Shendish, Hill Farm, Rectory Farm and Wayside Farm had not been the subject of a physical inspection resulting in Hill Farm being described as 'level access' to the High Street. This is patently absurd as the planners discovered when they drove UP to the Cricket Club which is opposite Hill Farm! (The farm is also all but adjacent to the 3 local schools comprising over 2000 students which cause traffic chaos twice a day already.). Further work is required to ensure that the development yield from urban sites, previously developed land and imposition of appropriate higher densities is maximised. Sites identified through preparation of a Brownfield Register (required to be in place by Christmas 2017) will also contribute to a reduction in the need to take greenfield / Green Belt land.</p> <p>Further discussions under the statutory Duty to Cooperate should be held with both Three Rivers and St Albans District Councils in the allocation and delivery of development on the boundary between these authorities.</p>
Include files	
Number	Question 35
ID	LPIO4390
Full Name	Mr Bruce Morris
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As per my answers to several other questions seems that the council has decided not to ask for a lower build number due to special circumstances in existence, AONB, St Albans gaining credit for East Hemel, overstretched infrastructure etc.
Include files	
Number	Question 35
ID	LP104396
Full Name	Mrs Victoria Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A more imaginative approach is needed.. co housing in Scandinavia is growing in popularity worldwide.
Include files	
Number	Question 35
ID	LP104531
Full Name	Mr Robert Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Sort out the St Albans area land issue and then consider building one purpose built new town or new section of HH and stop trying to solve the problem by tinkering around with all the beautiful historic small towns and villages.
Include files	
Number	Question 35
ID	LP104588
Full Name	Mrs Margaret Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No - lowe levels should also be considered.
Include files	
Number	Question 35
ID	LPIO4674
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO4761
Full Name	Mr Keith Bradbury
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Again, 'Urban Capacity' option should not have been rejected.
Include files	
Number	Question 35
ID	LPIO4952
Full Name	Mr Michael Arrowsmith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A lower level of population growth does not seem to have been fully covered. The rejected options should be more fully explored.
Include files	
Number	Question 35
ID	LPIO5048

Full Name	Mr Chris Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Firstly, DBC has not considered the rejected options properly.</p> <p>Secondly, it is not reasonable to set a housing target above numbers achievable when considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However, the Berkhamsted Residents' Action Group (BRAG), to which I belong, would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The currently adopted local plan was set at 430, which included Green Belt release, DBC's urban capacity is already 11% higher than that figure, without further Green Belt release. Proper consideration of increased density, including taller buildings in appropriate areas, would release more capacity.</p> <p>Thirdly, the Core Strategy Inspector was not convinced that DBC had fully assessed the housing need based on robust household projections, which is why he requested that that work should be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT, and DO NOT, have to form the housing target. They simply make up part of the evidence base, which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints were to apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent STRONG COMMITMENT to preserving the Green Belt.</p>

	<p>Fourthly, one of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and, as argued in previous submissions, the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household, as compared with the figure used in projections for 2036, would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity, and on the suitability of the sites proposed within the recognised constraints, as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO5050
Full Name	Mr Chris Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Firstly, the 'Urban Capacity' option should not have been rejected.</p> <p>Secondly, it is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However, the Berkhamsted Residents' Action Group (BRAG), to which I belong, would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The currently adopted local plan was set at 430, which included Green Belt release. DBC's urban capacity is already 11% higher than that figure, without any further Green Belt release. Proper consideration of increased density, including taller buildings in appropriate areas, would release more capacity.</p> <p>Thirdly, the Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that that work should be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT, and DO NOT, have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints, which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease</p>

pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

Fourthly, one of the biggest driving factors for increased housing stock is the decreasing average number of residents per household, and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted. BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household, as compared to the figure used in projections for 2036, would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity, and on the suitability of the sites proposed within the recognised constraints - as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

Include files	
Number	Question 35
ID	LPIO5344
Full Name	Ilyn horne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites as few as they may be must be the chosen option as it is wrong to steam roller Green Belt development. Green Belt development looks to be an easy option - has the council considered reviewing the number of empty properties, offices, warehouses to identify future development options?

Include files	
Number	Question 35
ID	LPIO5345
Full Name	Miss Giulietta Cinque
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>None of these housing needs plans seem to take any account of the effect on demand of Brexit, when or if it happens. It would be wrong to assume that the population in south-eastern England will continue to grow as it has done in the last few decades.</p> <p>In addition, smaller families MUST be encouraged, ie two children per couple, ie one person, one child, else these issues are only going to keep growing at a greater rate.</p> <p>There needs to be full assessment of all brownfield sites before spoiling our villages and small towns. Hemel Hempstead is a new town, able to support the majority of the growth, and if current developers don't want to build there, find those who will. It is all greed based ie the easier the job (on green belt), the cheaper, therefore more profit.</p> <p>If the council would like to protect the character of important landcapes, how on earth can you do this by building houses in villages. You are completely changing the character and landscape of villages. Total hypocrisy.</p>
Include files	
Number	Question 35
ID	LPIO5374
Full Name	Dr Rachael Frost
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	New towns or villages?
Include files	
Number	Question 35
ID	LPIO5421
Full Name	Mr Pdraig Dowd
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see the responses to the earlier 34 questions.
Include files	
Number	Question 35
ID	LPIO5479
Full Name	Mr John Ingleby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It is inaccurate to describe the numbers of homes discussed as “locally assessed need”, because no investigation has been conducted into the actual needs of local residents for a) housing which young people leaving home might afford and b) homes for older people seeking to downsize.
Include files	
Number	Question 35
ID	LPIO5757
Full Name	Dr Lucy Murfett
Company / Organisation	Chilterns Conservation Board
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Urban Capacity options plus any greenfield sites that do not harm the nationally designated landscape of the Chilterns AONB or its setting would have merit. The capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number. The growth level should be informed by sustainability appraisal and assessment of the cumulative effects on development on the Chilterns AONB, including effects on natural beauty, ecology, habitat fragmentation, air quality, tranquillity, water abstraction from chalk streams, visitor pressure etc. Please see the recently published guidance from the Chilterns Conservation Board: Position Statement on Cumulative Impacts of Developments on the Chilterns AONB which should be of assistance in identifying

	effects and assessing them, it is available online at http://www.cheshirecountrysideboard.org.uk/planning/development/consultations.html
Include files	
Number	Question 35
ID	LPIO5903
Full Name	Mr Michael Lelieveld
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No. See our response to question 16. As above, lower targets should also be explored which could be sustainable and matched with the capacity of local infrastructure. As noted in the response to question 11 above, there is little connection between the assessment of sites and housing need and capacity of local infrastructure.
Include files	
Number	Question 35
ID	LPIO5936
Full Name	Mr Grahame Partridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers do not have to form the housing target.
Include files	
Number	Question 35
ID	LPIO6111
Full Name	Mr Andrew Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I don't think they have. It's too high a level for the village and more importantly villagers to cope.
Include files	
Number	Question 35
ID	LPIO6215
Full Name	Mr Colin Tate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But this is subject to my response to Question 34 that my preference is for the Urban Growth Option and my comments querying whether the Council is justified in rejecting this Option.
Include files	
Number	Question 35
ID	LPIO6442
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is much evidence (eg. Planning for the right homes in the right places: consultation proposals". 2012 Inquiry findings) to suggest that the 'Urban Capacity' figure of 476 is reasonable and that it has been too hastily rejected.
Include files	
Number	Question 35
ID	LPIO6635
Full Name	Mrs Victoria Janaway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Greenbelt should not be a viable option. Alternatives need to be considered first before projections can be made.
Include files	
Number	Question 35
ID	LPIO6693
Full Name	Mr Alan Horn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	From evidence in all the accompanying documents I believe the council has considered all suitable growth levels at this time.
Include files	
Number	Question 35
ID	LPIO6713
Full Name	Mr Nick Hollinghurst
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO6799
Full Name	Mr Geoff Latham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It ought to consider higher levels.
Include files	
Number	Question 35
ID	LPIO6826

Full Name	Mr Nicholas Ring
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO6970
Full Name	Mr Edward Castle-Henry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I feel low impact eco dwellings could play a key role in not only helping meet your housing targets, while keeping the green natural areas looking that way, without imposing on the landscape with big sprawling developments, while simultaneously putting Dacorum on the map, leading a sustainable revolution.</p> <p>If it cannot be delivered sustainably, it would be delivered in a manner which, will not be able to continue into the future.</p>
Include files	
Number	Question 35
ID	LPIO7037
Full Name	mr michael hicks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO7082
Full Name	Alistair and Angela Allan
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are writing to lodge our objection to the outline future plans for Bovingdon.</p> <p>Whilst house building on green belt land is becoming inevitable, the impact of so many potential houses in Bovingdon will have a huge effect on the village's infrastructure. The traffic using the High Street is already too heavy (and that is before the arrival of Tesco), the school is full and the doctors and dentists will not be able to cope any further influx of patients.</p> <p>Clearly the desired answer is not to build any new homes but if that is not to be the case please consider very carefully any impact your final decision will have</p>
Include files	
Number	Question 35
ID	LPIO7125
Full Name	Mr & Mrs Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to</i></p>

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

BRAG RESPONSE TO Q35 - FULL DOC ATTACHED TO Q46

Question 35

Has the Council considered all reasonable alternative levels of growth?

No

Have not considered the rejected options properly.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476

underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at

430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green

Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release

more capacity.

The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was

also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target.

They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt

etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to cooperate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need .”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

□

One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are

	subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO7336
Full Name	Brian and Heidi Norris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We fully understand the need for additional housing in this country, but it should not be to the detriment of towns such as ours. We do not intend to reply to the 46 questions one by one, but support the answers given by the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group and support Option 1B in the Strategy Plan. Even this number of 600 further homes is, in our view, more than enough, but we understand that is an existing commitment.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35</p> <p><i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>Have not considered the rejected options properly.</p> <p><input type="checkbox"/></p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</p> <p><input type="checkbox"/></p> <p>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household</p>

projections, which is why he requested that work to be completed as part the early review. However, the Inspector was

also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target.

They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt

etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector

suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring

regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places:

consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this*

housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural

Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to cooperate

– to determine how any need that cannot be accommodated will be redistributed over a wider area. This means

that the level of housing set out in a plan may be lower or higher than the local housing need

.” Notwithstanding the fact

that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’,

BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly

given the Governments recent strong commitments to preserving the Green Belt.

□

One of the biggest driving factors for increased housing stock is the decreasing average number of residents per

household and as argued in previous submissions the decline in household numbers has not progressed at the level

previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example,

simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036

	<p>would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO7404
Full Name	Mr Clive Birch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The rejected options have not been considered properly. It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. I consider that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</p>
Include files	
Number	Question 35
ID	LPIO7922
Full Name	Dr Peter Chapman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 35

ID	LPIO7961
Full Name	Mr Norman Groves
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to confirm that I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG RESPONSE TO Q35</p> <p><input type="checkbox"/></p> <p>Have not considered the rejected options properly.</p> <p><input type="checkbox"/></p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</p> <p><input type="checkbox"/></p> <p>The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "lanning for the right homes in the right places: consultation proposals"with paragraph 9 stating that "</p>

Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this

housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities –through the duty to cooperate

–to determine how any need that cannot be accommodated will be redistributed over a wider area. This means

that the level of housing set out in a plan may be lower or higher than the local housing need

.”Notwithstanding the fact

that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’ ‘ocally assessed need’

BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly

given the Governments recent strong commitments to preserving the Green Belt.

One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level

previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example,

simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036

would bring the SHMA’ ‘ocally assessed needs’ down to the ‘raft Government numbers’ In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the

recognised constraints as should the allocation of development. It should be recognised that predictions of need are

subject to quite large margins of error given the various assumptions on which they are calculated.

Include files	
Number	Question 35
ID	LPIO8010
Full Name	Mr Michael Nidd
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Few if any of the rejected options were adequately and properly explored: it appears that “the answers” were predetermined and the subsequent considerations were shaped to suit.
Include files	
Number	Question 35
ID	LP108385
Full Name	Mrs Sarah Rees
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this</p>

would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints

	<p>of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO8401
Full Name	Helen & Stuart Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action group have responded in full to the issues and options consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation the we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity to emphasize just a few of the most important points within that response</p> <p>The number of proposed houses can only be determined once suitable sites have been ascertained, not the other way around.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476

new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

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	within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are
Include files	
Number	Question 35
ID	LPIO8416
Full Name	Spencer Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject</p>

to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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Include files	
Number	Question 35
ID	LP108460
Full Name	Mr Peter Shell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Because of the above I am not in a position to myself provide detailed answers to all the questions, but have seen the response prepared by BRAG and agree with their comments which should also be regarded as my own.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he

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Include files	
Number	Question 35
ID	LPIO8479
Full Name	Mrs Pat Berkley

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG's responses under my/our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476

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	within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO8497
Full Name	Mr Lawrence Sutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It</p>

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BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
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Include files	
Number	Question 35
ID	LPIO8678
Full Name	MRS G RUSSELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No</p> <p>1- Continuing 430pa and the Urban capacity options should also be considered.</p> <p>2- The economic outlook is bleak, so need and demand are likely to decrease.</p> <p>3- We will need as much farmland as possible when we leave the EU.</p> <p>Q35</p> <p>No</p> <p>1- cf responses to Q34</p>
Include files	
Number	Question 35
ID	LPIO8703
Full Name	MR NIGEL EGERTON-KING
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The lowest growth target should be used in view of the constraints here at Berkhamsted referred to elsewhere in this response and the amount of development that has already occurred or is in the pipeline.
Include files	
Number	Question 35
ID	LPIO9042
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO9055
Full Name	David Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No
Include files	
Number	Question 35
ID	LPIO9164
Full Name	S Langley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local

	<p>Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p>
Include files	
Number	Question 35
ID	LPIO9210
Full Name	GERALDINE ROBERTSON
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In regard to the suggestion that Dacorum Borough Council may also absorb some of the overspill of required housing development allocations from other areas is totally unacceptable.
Include files	
Number	Question 35
ID	LPIO9239
Full Name	Angela Walsh
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	If I was able to register on to the consult object portal (which I tried but was unsuccessful) I would choose Option B to limit building in Dacorum and, if at all possible, challenge the whole idea of building more housing in this area
Include files	
Number	Question 35
ID	LPIO9358
Full Name	KENNETH NEWELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Borough Issues</p> <p>For my objection to vastly increasing housing throughout the Borough, I can do no better than quote from an article from the Sunday Times on November 26th, 2017 written by the ex-BBC radio 4 Today show editor, Rod Liddle.</p> <p>He was reviewing the recent budget promise to build more than a million new homes and said “Yet no party thinks we should build fewer homes than Hammond has suggested. They’ll tell you we should build many more. And the reason we’re concreting over some of England’s most placid and peaceful scenery is never stated. It is almost entirely the result of our uncontrolled and utterly unsustainable immigration, which the government vowed to sort out but has been useless in so doing. Our birth rate is in decline – 1.79 children born per woman last year in the UK – so that’s not fuelling the demand. The reason we are bullied into building more houses is that, catastrophically, we let into our country a net 250,000 people a year. That’s a city the size of Newcastle every year.</p> <p>Earlier this year, the communities minister Sajid Javid said immigration was responsible for only a third of the need for new homes, his nose growing with every word uttered. This rubbish was exposed recently when it was revealed that eight out of ten of the new households formed over the past 15 years was headed by a migrant. With fewer migrants, we’d have no housing crisis. We wouldn’t need to pave over the entirety of southern England.”</p> <p>I do not wish this beautiful area, which has been my home for nearly 40 years, to be sacrificed to bail out the ineptitude of governments of all persuasions. As a general principle, I have no objection to limited immigration since I believe it is healthy for the country, but not on the scale we have experienced this century.</p>

Include files	
Number	Question 35
ID	LP109363
Full Name	Mrs Susan Newell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>My objections are in two parts. Firstly, I object to the general principle of vastly increasing housing throughout the Borough, and secondly, I object specifically to the proposals relating to Tring where I live.</p> <p>Borough Issues</p> <p>For my objection to vastly increasing housing throughout the Borough, I can do no better than quote from an article from the Sunday Times on November 26th, 2017 written by the ex-BBC radio 4 Today show editor, Rod Liddle.</p> <p>He was reviewing the recent budget promise to build more than a million new homes and said "Yet no party thinks we should build fewer homes than Hammond has suggested. They'll tell you we should build many more. And the reason we're concreting over some of England's most placid and peaceful scenery is never stated. It is almost entirely the result of our uncontrolled and utterly unsustainable immigration, which the government vowed to sort out but has been useless in so doing. Our birth rate is in decline – 1.79 children born per woman last year in the UK – so that's not fuelling the demand. The reason we are bullied into building more houses is that, catastrophically, we let into our country a net 250,000 people a year. That's a city the size of Newcastle every year.</p> <p>Earlier this year, the communities minister Sajid Javid said immigration was responsible for only a third of the need for new homes, his nose growing with every word uttered. This rubbish was exposed recently when it was revealed that eight out of ten of the new households formed over the past 15 years was headed by a migrant. With fewer migrants, we'd have no housing crisis. We wouldn't need to pave over the entirety of southern England."</p> <p>I do not wish this beautiful area, which has been my home for nearly 40 years, to be sacrificed to bail out the ineptitude of governments of all persuasions. As a general principle, I have no objection to limited immigration since I believe it is healthy for the country, but not on the scale we have experienced this century.</p>
Include files	
Number	Question 35
ID	LP109541
Full Name	Adrian miller

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I hope you will take on board these comments and develop your plan with more thought to character and nature of towns and villages and of sustainable growth.</p> <p>I am not saying no to more development but do no more than build 300 new homes p.a. over the next 5 years that is approximately 1.7% p.a. almost twice the population growth rate. The capital receipts you receive through additional housing new homes bonus and s106 payments should go toward schools, medical social infrastructure in Berkhamsted so that all can benefit.</p>
Include files	
Number	Question 35
ID	LP109735
Full Name	Brendon Sparks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Housing Density</u> The Government has suggested an increase from 430 to 602 new homes. The new plan deviates from this to much, much higher levels. The new plan promotes a level of 756 which is higher than the 602 Government target</p>
Include files	
Number	Question 35
ID	LP109780
Full Name	Aly MacLean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you</p>

accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.

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

Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options properly.
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based

on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

Include files	
Number	Question 35
ID	LP109828

Full Name	Mr Paul Wardle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient</i>

	<p><i>Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO9941
Full Name	Mr and Mrs Alan Bickerton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The councils throughout the country should be developing areas further away from the Southeast which are in need of regeneration to give opportunities to the areas where unemployment is the highest so as to give the people in those areas sustainable employment.</p> <p>Not so long ago those wanting their own house and work moved to where they could get work and buy a property, so why are we concentrating on more and more houses and employment in the Southeast when the Midlands and the North of the country need it far more and where people will be able to afford their own house.</p>

	If it is the government or your own council that is pushing this policy of more houses in our area then you need to tell them of this kind of feedback and propose that this area builds less houses not more.
Include files	
Number	Question 35
ID	LPIO10003
Full Name	mr Kevin Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite</p>

large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options properly.
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

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Include files	
Number	Question 35
ID	LPIO10051
Full Name	Jill Mewha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans.</p>

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Include files	
Number	Question 35
ID	LPIO10120
Full Name	Melanie Frankel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to</p>

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Include files	
Number	Question 35
ID	LPIO10168
Full Name	Natalie Crane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as

confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

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Include files	
Number	Question 35
ID	LPIO10225
Full Name	Mr Tim Beeby
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co- operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban

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	margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO10272
Full Name	John and Jane Beeley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It</p>

should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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Include files	
Number	Question 35
ID	LPIO10322
Full Name	Kathleen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing in response to the latest plan for housing development in Berkhamsted, most of which suggests an excessive and impractical number of new houses. I have read your Local Plan 2017 and I have read the reply of Berkhamsted Residents' Action Group (BRAG) and agree that <u>Option 1B is the only option acceptable</u>.</p> <p>I agree entirely with the BRAG response to your plan.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> Have not considered the rejected options It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

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Include files

Number

Question 35

ID	LPIO10371
Full Name	J&P Savage
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Secondly, the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p>

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

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Include files	
Number	Question 35
ID	LPIO10436
Full Name	Mr Daniel Parry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which</p>

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Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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Include files	
Number	Question 35
ID	LPIO10485
Full Name	David Burbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, <u>I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</u></p> <p><u>However, I would like to take this opportunity emphasize just a few of the most important points within that response</u></p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be</i></p>

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Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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	<p><i>These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO10535
Full Name	Mr Stephen Doughty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>I would however like to make a few specific comments.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p>

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	<p>person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO10583
Full Name	Mr Roger Petts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints

which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Include files	
Number	Question 35
ID	LPIO10630
Full Name	Simon Chilton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based

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Include files	
Number	Question 35
ID	LPIO10680
Full Name	Sally and David Williams

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please register as support for BRAG's submission.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co- operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally

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Include files	
Number	Question 35
ID	LPIO10728
Full Name	Mrs Jenny Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then</p>

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BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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Include files	
Number	Question 35
ID	LPIO10762
Full Name	Taylor Wimpy Strategic Land
Company / Organisation	Taylor Wimpy Strategic Land
Position	C/O Pegasus Group
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	By extension of our response to Question 34 it is necessary to consider whether planned growth may need to be higher than that set out within the standardised housing methodology calculations. For full response please see question 46.
Include files	
Number	Question 35
ID	LPIO10822
Full Name	Grant Imlah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Moreover i am aware that The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name. However, we would like to take this opportunity emphasize just a few of the most important points within that response. It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy

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BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
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Include files	
Number	Question 35
ID	LPIO10874
Full Name	Sheila Dawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I have studied the above plan, accessed the BRAG website, and attended the Berkhamsted Citizens Association Visioning Evening on 15 November and the

Berkhamsted Town Council presentation on 22 November.

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

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Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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Include files	
Number	Question 35
ID	LPIO10922
Full Name	Jean Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</p> <p>DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p>
Include files	
Number	Question 35
ID	LPIO10972

Full Name	Christopher Stafford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states <i>"Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need."</i> DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large</p>

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BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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Include files	
Number	Question 35
ID	LPIO11022
Full Name	Mrs Patti Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local</p>

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

BRAG response to Question 35 (please note full document is attached to Q46)

Has the Council considered all reasonable alternative levels of growth?

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co- operate – to determine how any need that cannot be*

	<p><i>accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO11069
Full Name	J M Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated</p>

	<p>will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</p> <p>DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p>
Include files	
Number	Question 35
ID	LP1011149
Full Name	Cally Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • Have not considered the rejected options properly. • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the

evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

Include files	
Number	Question 35
ID	LPIO11244
Full Name	Jon Rollit
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO11293
Full Name	Kate Locke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In addition I would reiterate the extensive points made in the BRAG response to the 'Issues & Options' consultation. I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. The Berkhamsted Residents Action Group (BRAG) has responded in full.</p> <p>In addition, I like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised</p>

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BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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Include files	
Number	Question 35
ID	LPIO11382
Full Name	Ms Lorraine Gilmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>BRAG has responded in full to the 'Issues & Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish Dacorum Borough Council (DBC) to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasise some of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states <i>"Local planning authorities then need to determine whether there are any</i></p>

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Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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	margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO11432
Full Name	Conian
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various</p>

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BRAG response to Question 35 (please note full document is attached to Q46)

Has the Council considered all reasonable alternative levels of growth?

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	<p>previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p>
Include files	
Number	Question 35
ID	LPIO11457
Full Name	Mr & Mrs J Neale
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes – to avoid intervention by DCLG.
Include files	
Number	Question 35
ID	LPIO11484
Full Name	Mr Alan Ledger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The lowest growth target should be used in view of the constraints here at Berkhamsted referred to elsewhere in this response and the amount of development that has already occurred or is in the pipeline.
Include files	
Number	Question 35
ID	LPIO11538
Full Name	Ms Eliza Hermann
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Council's proposed growth level options are all too high, and fail to take into account Dacorum's natural constraints of the Chilterns AONB and the Green Belt. Given there is no single agreed method for calculating Objectively Assessed Housing Need (OAN), and given there is as yet no outcome from the government following its "Right Homes Right Places" consultation, I believe the most logical starting point is the approved 2006-2031 Core Strategy figure of 430 homes per year. That figure includes the recent removal of 82.2 hectares of Green Belt (via the six Local Allocations) which is a large amount of Green Belt land that will now be built on and lost as green space forever. Any figure above 430 homes per year must be limited to what is achievable from optimising "urban capacity" i.e. through brownfield redevelopment and regeneration. I understand that Dacorum has calculated this figure as 476 homes per year, and therefore 476 homes per year is the most reasonable target figure . Beyond this, the emphasis must be on explicit recognition of the constraints on meeting housing need resulting from the need to protect the Chilterns Area of Outstanding Natural Beauty and the Green Belt.
Include files	
Number	Question 35
ID	LPIO11561
Full Name	Ms Anna Barnard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Consultation on the government's paper ' <i>Planning for the Right Homes in the Right Places</i> ' only closed in November. It did not take into account the recent report on the considerable drop in net migration and is fundamentally flawed by taking the 'one size fits all' approach. Results from the consultation are awaited and it is not yet statutory, yet Dacorum has produced a plan based on unproven and unaccepted calculations. Clearly this is premature and a knee-jerk reaction to pressure from developers and the fear of speculative applications which are thought may be lost on appeal. The Council has its housing numbers until 2031 and has acknowledged that a higher figure than the 10,750 dwellings provided by the Core Strategy is likely to be delivered by 'windfall' development, so any appeals on inappropriate sites can be defended.

	I do not wish to suggest that any one option of proposed development numbers is preferable as I am of the opinion that none of them are acceptable as the whole exercise is premature given the government's recent consultation and the relative newness of the Adopted Local Plan.
Include files	
Number	Question 35
ID	LPIO11620
Full Name	Janet and James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as</p>

should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to

	<p>be the starting point, particularly given the Governments recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO11654
Full Name	john and barbara neale
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes – to avoid intervention by DCLG.
Include files	
Number	Question 35
ID	LPIO11707
Full Name	Susanne Rees
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I believe that Dacorum should push back on government demands for more housing, as the rate of development envisaged is unsustainable, given that according to scientists we have now entered the Earth's Sixth Mass Extinction. Therefore, the adoption of a sustainable policy is critical.

Include files	
Number	Question 35
ID	LPIO11774
Full Name	Edmund Hobley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>Brag Response to question 35 (please note full document is attached to Q46)</p>

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options properly.
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
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- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an

	<p>example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO11924
Full Name	Janet Mason
Company / Organisation	Berkhamsted Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored.</p> <p>A higher level of urban capacity for Hemel Hempstead (above the assumed figure of 8900) should be examined. This should take into account recent government statements encouraging the use of high rise buildings in appropriate locations.</p>
Include files	
Number	Question 35
ID	LPIO11970
Full Name	Dee Sells
Company / Organisation	Markyate Parish Council
Position	Parish Clerk/ RFO
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Markyate Parish Council has made its comments earlier in the consultation. We do not believe that any new housing should be considered until the water supply issue is resolved. We do not believe Markyate is appropriate for any further building save to meet local needs.</p>
Include files	

Number	Question 35
ID	LPIO12072
Full Name	David Wilyman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>Standard BRAG response to Question 35. Please note full document is attached to Question 46</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p>

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO12166
Full Name	Ray Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised</p>

constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly. Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough's policy. They must not be allowed to 'buy out' their obligation.

Standard BRAG response to Question 35. Please note full document is attached to Q46.

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
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Include files	
Number	Question 35
ID	LPIO12185
Full Name	Ms Julie Hollway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>4. I would however also recommend reviewing the figures quoted in the document regarding the number of homes actually needed in the area.</p> <p>5. Please also assess what should be considered in the Dacorum plan vs plans for adjacent areas, eg the site east of Hemel alongside M1 and currently considered to be St Albans should be considered as delivering homes under the Dacorum local plan as all the infrastructure for these proposed homes will be provided by Hemel.</p>
Include files	
Number	Question 35
ID	LPIO12227
Full Name	Douglas & Christina Billington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller

buildings in appropriate areas would release more capacity.

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
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Include files

Number	Question 35
ID	LPIO12306
Full Name	Richard Frankel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>Standard BRAG response to Question 35. Please note full document is attached to Question 46.</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p>

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Include files	
Number	Question 35
ID	LPIO12373
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO12397
Full Name	ms rona morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As per my answers to several other questions seems that the council has decided not to ask for a lower build number due to special circumstances in existence, AONB, St Albans gaining credit for East Hemel, overstretched infrastructure etc.
Include files	
Number	Question 35
ID	LPIO12408
Full Name	ms rona morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	I am also deeply concerned about the apparent acceptance by Dacorum Borough Council that they will adopt housing numbers far in excess of that actually required. I'm not convinced they have seriously looked at all options to reduce the actual numbers and instead are happy to take the easy path of following what they perceive is being asked of them by government regardless of the consequences on the local people. .
Include files	
Number	Question 35
ID	LPIO12450
Full Name	Judy Halden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised</p>

constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

Standard BRAG response to Question 35. Please note full document is attached to Question 46.

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	<ul style="list-style-type: none"> One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO12498
Full Name	Meenakshi Jefferys
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed</p>

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BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options properly.
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
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Include files	
Number	Question 35
ID	LPIO12545
Full Name	Mrs Jane Barrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of</p>

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Standard BRAG response for Question 35. Please note full document is attached to Question 46.

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Include files	
Number	Question 35
ID	LPIO12595
Full Name	mr paul healy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

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

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BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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Include files

Number

Question 35

ID	LPIO12644
Full Name	Merrick Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasise just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options

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Include files	
Number	Question 35
ID	LPIO12693
Full Name	Monika & Casper Gibilaro
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under our name</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite</p>

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Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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Include files	
Number	Question 35
ID	LPIO12741
Full Name	Lorna Ginn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that</i></p>

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	<p><i>determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO12790
Full Name	Mr Raymond Phipps
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the

amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.

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	allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO12837
Full Name	Ingrid Carola McKenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject</p>

to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	<p>of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO12885
Full Name	Mr Stephen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those

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Include files	
Number	Question 35
ID	LPIO12939
Full Name	Jon Whittle
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban

boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

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	margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO12988
Full Name	Edward Keane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on</p>

which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options properly.
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
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	<p>of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO13037
Full Name	Bettina Deuse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local</p>

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

BRAG response to question 35 below (full BRAG response see question 46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	<p><i>accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO13090
Full Name	Mr Paul Tinworth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum’s Local Plan.</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban

boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.

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	that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO13138
Full Name	Hilary Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on</p>

which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number

	of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO13172
Full Name	Mr J P Goodings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No
Include files	
Number	Question 35
ID	LPIO13196
Full Name	Mr J G Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO13263
Full Name	D. Phillips
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully concur with the comments attached from BRAG. The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local authorities have to calculate housing need but then Government policy states 'Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. This include, but are not limited to, ancient woodland, the green belt, areas of outstanding natural beauty and sites of special scientific interest. They also need to engage with other authorities - through the duty to co-operate - to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need'. DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependant on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the

amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the

	allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO13416
Full Name	Mr Alan Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes
Include files	
Number	Question 35
ID	LPIO13417
Full Name	Mrs Christine Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes
Include files	
Number	Question 35
ID	LPIO13472
Full Name	Mrs Catherine Imber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

No – it has eliminated the Urban Capacity option.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	<ul style="list-style-type: none"> One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO13520
Full Name	Deborah Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore</p>

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

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
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	<p>area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO13575
Full Name	Mr Alan O’Neill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p>

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	<p>person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO13628
Full Name	Sue O'Neill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

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Include files

Number

Question 35

ID	LPIO13690
Full Name	Tim Uden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO13755
Full Name	Edward Hatley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year.</p> <p>However the figure of 476 underestimates the amount that can be achieved within urban boundaries. It is accepted that Local Authorities have to calculate housing need.</p> <p>They must however note that Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>"</p> <p>DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated. In so doing should the amount should equate to a minimum of three years</p>

housing supply. This, coupled with increased density numbers in appropriate areas, would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on:

A realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints

A realistic assessment of the allocation of development.

The recognition that predictions of need are subject to quite large margins of error because of the various assumptions on which they are calculated.

I do not believe that DBC have considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local*

	<p><i>housing need.</i>” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO13806
Full Name	Mr Roger Didham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are</i></p>

not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
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	<p><i>prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO13861
Full Name	Alex Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this

opportunity emphasize just a few of the most important points within that response:-

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly. Q17. Developers must be forced to provide the number of affordable homes dictated by the Borough’s policy. They must not be allowed to ‘buy out’ their obligation.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also

contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more

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	allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO13912
Full Name	Mr Chris Stoneman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In particular we are concerned at the number of houses proposed, our suggestion is 800-1000, but even this would have serious consequence to a town that already has strains on its High Street and in addition has full schools and GP Practices.
Include files	
Number	Question 35
ID	LPIO13950
Full Name	Mrs Emma Fallon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I do not object to Dacorum addressing the need for additional housing in the area or indeed of the careful or well thought out planning for new housing in the area
Include files	
Number	Question 35
ID	LPIO13991
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	Basing your planning targets on unknown quantities and guesstimates is both naive and potentially devastating to this borough.
Include files	
Number	Question 35
ID	LPIO14030
Full Name	Danny Jennings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum's Local Plan.</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local</i>

	<p><i>planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt.</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO14079
Full Name	Mr John Goffey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response</p>

to the DBC *Issues and Options* document. We would, in addition, like to add the following points concerning Question 33 of the above document.

...

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	<ul style="list-style-type: none"> One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO14127
Full Name	Sue Elleray
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing</p>

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	<p><i>authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt.</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO14178
Full Name	Mr Richard White
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the

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Include files	
Number	Question 35
ID	LPIO14322
Full Name	Ms Vicky Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as do confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities –through the duty to co-operate –to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should</p>

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Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government's recent strong commitments to preserving the Green

	<ul style="list-style-type: none"> One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO14331
Full Name	Mr Garrick Stevens
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored.</p> <p>[Response to Q16:</p> <ul style="list-style-type: none"> The SHMA identifies the quantum of Objectively Assessed Need for <i>affordable homes</i> as 366 pa [see Table 43 page 129, Intermediate 108/Social 258 Total 366]. This compares with the OAN total of 756 pa implying the <i>demand</i> for open market dwellings is 390 pa. If the policy priority is to build to meet the <i>need</i> for affordable homes, these could be accommodated within the prevailing target of 430 pa, viz per the Core Strategy adopted September 2013, and <u>without</u> the release of sensitive areas in the Green Belt. In light of DCLG guidance in September 2017, and the likelihood of conflict with DCLG policy, the Borough would be prudent to consider how best to accommodate new build within established constraints and minimal impact on Green Belt release, based on: Growth options should be dependent on a realistic assessment of capacity and the suitability of the

	<p>sites proposed within the recognised constraints, particularly infrastructure, as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are</p> <ul style="list-style-type: none"> • As an example of the variance among predictions, the report Dacorum Strategic Infrastructure Study [Feb. 2011] shows a decline in Berkhamsted's population beyond 2021. • <i>In paragraphs 6.2.7 and 6.2.8 it is made abundantly clear, when developing the current Core Strategy, that anything over the current housing target [in Berkhamsted (1180 for 2006 – 2031)] could not be sustained on infrastructure grounds.]</i>
Include files	
Number	Question 35
ID	LPIO14407
Full Name	Ray Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities –through the duty to co-operate – to determine how any need that</p>

cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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	<p><i>Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO14456
Full Name	Giselle Okin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p>

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	<p>person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO14505
Full Name	Mr David Griffin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</i></p> <p><i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i></p> <p><i>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this</i></p>

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Include files	
Number	Question 35
ID	LPIO14688
Full Name	Ann Bunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Probably not ! Plenty of small sites available in Dacorum
Include files	
Number	Question 35
ID	LPIO14718
Full Name	Mrs Jean Perkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO14782

Full Name	Ms Paula Farnham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues & Options' consultation. I could make similar comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity to emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options

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- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the

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Include files	
Number	Question 35
ID	LPIO14814
Full Name	Steve Baker
Company / Organisation	CPRE - The Hertfordshire Society
Position	Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Council needs to consider the capacity of the Borough to provide for growth as the starting point. However, it is not possible to provide any further comment pending the issuing of new National Planning Practice Guidance on this matter.
Include files	
Number	Question 35
ID	LPIO14854
Full Name	Bev Mckenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In addition, I draw attention to some of the most important points within that response Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476

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Include files	
Number	Question 35
ID	LPIO14900
Full Name	Mr Michael Curry
Company / Organisation	Tring Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>See the response to Q33 & Q34 above</p> <p>[Response to Q33: In light of the Government's white paper 'Planning for the right homes in the right places' Options 1 and 3 appear logical. Whilst recognising the pressure being faced by the Planning Team, the options being considered should have reflected more closely the levels of growth that can be achieved sustainably (See Q16).</p> <p>ption 2 follows what one could call the accepted norm in terms of the procedural steps to take when deriving a figure. What is questionable is whether due consideration has been given to the Borough's ability to absorb the quoted figure because of the amount of land with Green Belt status and the Chilterns A.O.N.B.</p> <p>That AVDC is taking allocations from High Wycombe and Chiltern District Councils because of similar constraints is germane. There is no evidence that Dacorum has actively explored the potential of exporting a large proportion of the calculated growth to other less constrained areas of Hertfordshire or other authorities.</p> <p>Such discussions should have taken place before the Issues and Options consultation. There should also be clarity on the possible inclusion of the Crown Estate development adjacent to Hemel Hempstead within St Alban's.</p> <p>That the Issues & Options consultation is being conducted without including what could be the most realistic housing option calls into question the validity of the exercise. Consequently these are not the most reasonable options to consider.</p> <p>[Response to Q16: The locally assessed housing need figure (756) fails to take into account the constrained nature of land availability in Dacorum because of Green Belt and A.O.N.B.</p> <p>A figure should be derived that reflects the ability of the Borough to deliver the housing growth and the necessary infrastructure ("organic growth"). Whilst respecting the Government's policy to provide a major boost to the housing market, a blanket imposition of a target without consideration of local circumstances is irresponsible.</p> <p>As an example of the alternative basis suggested, the following calculation is based upon the assumption that the maximum number of houses that each group in the settlement hierarchy can take sustainably is the minimum figure quoted in option 1:</p> <p>1,750 Hemel Hempstead Option 1A</p> <ul style="list-style-type: none"> • 1,200 Berkhamsted & Tring Option 1A • 850 Bovingdon, Kings Langley & Markyate Option 1C • 3,800 Total or 640 dwellings pa. <p>The assumption is probably weakest in relation to Hemel Hempstead, which probably have a greater capacity to absorb housing. Taking the 2,980 figure quoted in option 1b the total contribution increases to 5,030 or 694 dwellings per annum.</p>

	<p>Closer engagement with local communities at the beginning of the planning process would enable a realistic assessment of the potential contribution each settlement can make.]]</p> <p>[Response to Q34: The 'Urban Capacity' option</p> <ul style="list-style-type: none"> • The Brownfield Register will not be published until 2018. Current data was collated from the existing data sources of Dacorum's Strategic Housing Land Availability Assessment (SHLAA), existing planning permissions and pending planning decisions. Once the results of the call-for-sites in are and the new register is published the figures used are in question • That a deficit relative to housing need can be considered an 'exceptional circumstance' is in doubt given recent Government statements • A clear and accepted policy on when it can be deemed that Green Belt does not meet the Government's tests for such a designation is needed <p>With an answer to the points above one will have a realistic option available for consideration.]</p>
Include files	
Number	Question 35
ID	LPIO14957
Full Name	Malcolm and Jill Allen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special</i></p>

Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient*

	<p><i>Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO15007
Full Name	Mr Clive Freestone
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more
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environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green

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Include files	
Number	Question 35
ID	LPIO15055
Full Name	Mr & Mrs D A Simmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.</p> <p>We request you accept this summary as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>We would like to take this opportunity to emphasize a few of the most important points within that response, <i>in particular our response to Q25.</i></p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper

- consideration of increased density including taller buildings in appropriate areas would release more
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Include files

Number	Question 35
ID	LPIO15284
Full Name	Caroline Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35: <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints

which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

Include files	
Number	Question 35
ID	LPIO15334
Full Name	Mr Alan Conway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues & Options Consultation.</p> <p>I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q16,Q33,Q34, & Q35 If the reality is that the proposals being made by St Albans impinge on Dacorum then an assessment of this should be included with a suitable caveat. I support the BRAG submission.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co- operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" Notwithstanding the fact that BRAG has grave reservations about the methodology in

	<p>the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO15348
Full Name	Mr Alan Conway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues & Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q33 to Q45 I support the BRAG submission. Yet again the failure to provide an accurate base from which to proceed renders much of what follows suspect and in many parts misleading.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also

contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity

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	within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO15383
Full Name	Sue Wolstenholme
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p>Standard BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <ul style="list-style-type: none"> • Have not considered the rejected options • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in

	<p>neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO15445
Full Name	Nick Hanling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.

I would like to take this opportunity emphasize some of the most important points within that response.

It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper

consideration of increased density including taller buildings in appropriate areas would release more capacity

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Include files	
Number	Question 35
ID	LPIO15493
Full Name	Sarah and Nigel Tester
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding</p> <p>St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various</p>

assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

	<ul style="list-style-type: none"> One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO15550
Full Name	Miss Tanya Assarat
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> Have not considered the rejected options properly It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Include files

Number	Question 35
ID	LPIO15599
Full Name	Melanie Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding</i>

	<p><i>Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co- operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO15665
Full Name	Mr James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p>

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1

	<p>person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p>
Include files	
Number	Question 35
ID	LPIO15724
Full Name	Mark Pawlett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>

Include files	
Number	Question 35
ID	LPIO15772
Full Name	Maria & Colin Sturges
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35

ID	LPIO15819
Full Name	David Kerrigan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific</i>

	<p><i>Interest. They also need to engage with other authorities – through the duty to co- operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO15877
Full Name	D B Land and Planning
Company / Organisation	D B Land and Planning
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • DBLP take the position that the Council has considered a broad spectrum of housing scenarios and that lower levels of growth have been properly discounted through the process.
Include files	
Number	Question 35
ID	LPIO15986
Full Name	Mr Robert Sellwood
Company / Organisation	The Crown Estate
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Whilst other options could have been considered between 602 dpa and 1,100 dpa, it would not have assisted the clarity of the consultation process. The three levels of growth usefully establish the range of issues to be considered.
Include files	
Number	Question 35
ID	LPIO16131
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers</p>

	irreparable harm to unprepared settlements within the district.
Include files	
Number	Question 35
ID	LPIO16190
Full Name	Stuart Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO16247
Full Name	Stuart Mears
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</p> <p>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO16263
Full Name	Dave Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development

	<p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO16308
Full Name	Kitty Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>please find the attached report written on mine and other residents request.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be</p>

	<p>applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LP1016370
Full Name	Aaron Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I support GFRA responses see below.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers</p>

	irreparable harm to unprepared settlements within the district.
Include files	
Number	Question 35
ID	LPIO16418
Full Name	Ruth and Stephen Wright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q 16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on</p>

which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

	<ul style="list-style-type: none"> One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO16483
Full Name	Andrew Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in</p>

	<p>relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO16559
Full Name	Ian Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> . Have not considered the rejected options properly. . It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. . The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure,

environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”*

Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

Include files	
Number	Question 35

ID	LPIO16694
Full Name	Katie Parsons
Company / Organisation	Historic England
Position	Historic Environment Planning Advisor
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We do not have a preference for any growth option at present until further information and analysis has been carried with regards to potential heritage impacts. However, we are keen to ensure that growth and development conserves and enhances the significance of the Borough's many heritage assets.</p> <p>We are pleased to see that the cumulative impacts deriving from the potential development at Gorhambury in the neighbouring authority of St Albans City and District is being considered as part of the growth options appraisal process. A good understanding of the cumulative impacts of development is an important part of understanding the wider impacts upon the historic environment.</p>
Include files	
Number	Question 35
ID	LPIO16726
Full Name	Lynsey Hillman-Gamble
Company / Organisation	Central Bedfordshire Council
Position	Strategic Plan Partnership Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Issue 25 – It is considered that as the local plan will be submitted after the 31st March 2018 deadline, the plan should seek to accommodate the upper Government figure for growth (option 3) until such time that the finalised methodology is published and a final housing figure is identified. Planning for the upper limit will ensure that the Borough Council can deliver the final housing requirement identified</p>
Include files	
Number	Question 35
ID	LPIO16842
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO16910
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of</p>

	<p>exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO16998
Full Name	Chris Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in</p>

	<p>relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LP1017055
Full Name	Jade Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	

Number	Question 35
ID	LPIO17112
Full Name	Grahame Senior
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO17247
Full Name	Debbie Crooks Pam Moss
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper

consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Include files	
Number	Question 35
ID	LPIO17303
Full Name	Margaret and Andrew Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which</i>

	<p><i>prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO17359
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>...</p> <p>GFRA Response to Question 35, full document attached to question 46</p>

	<p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO17411
Full Name	Lesley Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 35 below (copy of full response attached to question 46)</p> <p><i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16 • See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the "cart before the horse".

Include files	
Number	Question 35
ID	LPIO17466
Full Name	Sara Bell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO17525
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>...</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO17573
Full Name	MR DAVID BROWN
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 35 below (copy of full response attached to question 46)</p>

	<p><i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16 • See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the “cart before the horse”.
Include files	
Number	Question 35
ID	LPIO17632
Full Name	Paul Hembury
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning & Development details my concerns comprehensively.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire’s policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers</p>

	irreparable harm to unprepared settlements within the district.
Include files	
Number	Question 35
ID	LPIO17706
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO17755
Full Name	Diana Woodward
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express.</p> <p>BCA response to Question 35 below - full document attached to Question 46</p> <p>Has the Council considered all reasonable alternative levels of growth?</p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16 (copy below) • See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the “cart before the horse”. <p>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p>1 D) 476 Urban Capacity with a figure of less than 602 as per the Government’s draft figure</p> <ul style="list-style-type: none"> • The starting point should be the Urban Capacity that doesn’t require any Green Belt release • The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply. • 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.
Include files	
Number	Question 35

ID	LPIO17811
Full Name	John and Helen Osborne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached). GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO17869
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO17927
Full Name	Dave Davies
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of</p>

	<p>exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LP1018036
Full Name	mr Richard Lambert
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMENT), my own views can be summarised in a handful of bullet point.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given</p>

	<p>significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO18107
Full Name	Mr Graham Bright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities</p>

	and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.
Include files	
Number	Question 35
ID	LPIO18164
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO18221
Full Name	Nicky and Dave Hulse
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO18275
Full Name	Gail Skelton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little</p>

and to this extent, I sincerely hope that I am proved wrong.

Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he

requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Include files	
Number	Question 35
ID	LPIO18334

Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO18502
Full Name	Melanine Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt. • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household

	<p>numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 35
ID	LPIO18549
Full Name	Mrs Juliet Chodzko
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the

housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Include files	
Number	Question 35
ID	LPIO18595
Full Name	Captain Andrew Cassels
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints

	<p>of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO18641
Full Name	Lindy Weinreb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16 (below) • See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the "cart before the horse". <p>Question 16</p> <p>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p>1 D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</p> <ul style="list-style-type: none"> • The starting point should be the Urban Capacity that doesn't require any Green Belt release • The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity

	<p>is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity</p> <ul style="list-style-type: none"> • DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply. • 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.
Include files	
Number	Question 35
ID	LPIO18688
Full Name	Hilary Abbott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to,</i></p>

Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the ‘draft Government figure’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
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	<p>proposals” with paragraph 9 stating that “<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO18734
Full Name	Paul and Gillian Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you

accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However, the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes, Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This Sample Members' Abridged Response E-mail Page 2 of 2 means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to cooperate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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Include files

Number

Question 35

ID	LPIO18780
Full Name	Berkhamsted Citizens
Company / Organisation	Berkhamsted Citizens
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16 (below) • See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the “cart before the horse”. <p>Question 16</p> <p>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p>1 D) 476 Urban Capacity with a figure of less than 602 as per the Government’s draft figure</p> <ul style="list-style-type: none"> • The starting point should be the Urban Capacity that doesn’t require any Green Belt release • The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity • DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply. • 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.
Include files	
Number	Question 35

ID	LPIO18829
Full Name	Lyndsay Slater
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need."DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p>

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
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	<p>person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p>
Include files	
Number	Question 35
ID	LPIO18876
Full Name	Andrew and Margit Dobbie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density</p>

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Question 35 *Has the Council considered all reasonable alternative levels of growth?*

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Include files	
Number	Question 35
ID	LPIO18922
Full Name	Katherine Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>...</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC

urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity

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	margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO19000
Full Name	Mrs Emma Robertson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19063
Full Name	Barbara Gainsley
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</p> <p>Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.</p> <p>Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.</p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16 • See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the “cart before the horse”.
Include files	
Number	Question 35
ID	LPIO19120
Full Name	Bill Ahearn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to register my objections to some of the proposals under consideration on the grounds they are simply to excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire’s policy designations and 2) It is clear that</p>

	<p>there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19178
Full Name	Ms Sarah Hain
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have</p>

	not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.
Include files	
Number	Question 35
ID	LPIO19236
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35

ID	LPIO19293
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Our family (4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town's infrastructure. We feel strongly that green belt land should be preserved for future generations.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19311

Full Name	Richard House
Company / Organisation	Gladman Development Limited
Position	Policy Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As indicated above, Gladman considers that the Dacorum Local Plan should be planning for 1,100 net new dwellings per annum or 25,300 dwellings over the plan period. Whilst this is clearly a significant increase compared to the current adopted Core Strategy, such an increase will be absolutely essential if the Government's aspiration of significantly boosting housing supply is to be achieved.</p> <p>The Autumn Budget 2017 brought further details of the Government's commitment to building a Britain that is 'fit for the future'. A prominent feature of this is tackling the housing crisis, with housebuilding featuring prominently amongst the Chancellor's announcements, which included further confirmation that:</p> <p><i>'The Government is determined to fix the broken housing market, and restore the dream of home ownership for a new generation.'</i></p> <p>The affordability of housing for young people is a key challenge for the Government, and whilst it is recognised that there is no 'single magic bullet' to solve the housing crisis, the Government is actively seeking to tackle</p> <p>1 Land and Buildings off Watery Lane, Curborough, Lichfield (Appeal Reference APP/K3415/A/14/2224354)</p> <p>obstacles standing in the way of first-time buyers. The Government sees a 'big step up' in new house building as an important element in its strategy to address the acute affordability problem and has set a goal to build 300,000 homes a year by the mid-2020s.</p> <p>The vital importance of housing to the economic success of our cities and regions is also highlighted in the Government White Paper "<i>Industrial Strategy: building a Britain fit for the Future</i>", which was published in November 2017. This includes reference to the introduction of planning reforms that will ensure more land is available for housing, and that better use is made of underused land in our cities and towns. It also sets out the challenge to raise housing supply to 300,000 per year before the end of the current Parliament. The Government wants to support places with ambitious and innovative plans to build additional homes where they are needed, and those which will support wider economic growth. Furthermore, the Government wants to support</p>

	<p>greater collaboration between councils, a more strategic approach to the planning of housing and infrastructure, more innovation and high quality design in new homes and the creation of the right conditions for new private investment.</p> <p>It is important that the Dacorum Local Plan makes a significant contribution to the Government's strategy for housing and economic growth.</p>
Include files	
Number	Question 35
ID	LPIO19347
Full Name	Stuart, Miranda & Melissa Kay
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co- operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government</p>

figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally

	<p>assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO19397
Full Name	Wai Tang and Greg Barfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please note we are aware that the Berkhamsted Residents Action Group (BRAG) has responded in full to the "Issues & Options" consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.</p> <p>We wish to add our concerns to the DBC local plan issues and options consultation.</p> <p>We are particularly concerned about the following</p> <p>Q16, Q33, Q34 & Q35 It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific</p>

Interest. They also need to engage with other authorities "through the duty to co-operate" to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need. □ DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the "draft Government figure". In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response to Question 35 (please note full document is attached to Q46)

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient*

	<p><i>Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”</i> Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO19443
Full Name	Philippa Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan.</p> <p>Question 35</p> <p><i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16

	<ul style="list-style-type: none"> See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the “cart before the horse”.
Include files	
Number	Question 35
ID	LPIO19498
Full Name	John Wignall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire’s policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19555
Full Name	Kevin Cullen
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please refer to the attached report.(BRAG)</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19613
Full Name	Mark Lawson and Sharon Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that

	<p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19669
Full Name	Vivienne Inmonger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable</p>

	<p>alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19728
Full Name	John Inmonger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be</p>

	<p>applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19782
Full Name	Ben Barth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p>Question 35</p> <p><i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16 (Copy below) • See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the "cart before the horse". <p>Question 16</p> <p>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p>1 D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure</p> <ul style="list-style-type: none"> • The starting point should be the Urban Capacity that doesn't require any Green Belt release • The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller

	<p>buildings in appropriate areas would release more capacity.</p> <ul style="list-style-type: none"> • DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply. • 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.
Include files	
Number	Question 35
ID	LPIO19851
Full Name	Jon Esson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in</p>

	<p>relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO19935
Full Name	Chris Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA)</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	

Number	Question 35
ID	LPIO19992
Full Name	mrs sue van rhee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20049
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20106
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p>

	<p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20164
Full Name	Sherry and Haydn Bond
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the</p>

	<p>South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20221
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable</p>

	<p>alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20269
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller

buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Include files	
Number	Question 35
ID	LPIO20324
Full Name	David Clarke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers</p>

	irreparable harm to unprepared settlements within the district.
Include files	
Number	Question 35
ID	LPIO20382
Full Name	Deborah Turnbull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20430
Full Name	Jane Collis
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" Notwithstanding the fact that BRAG

	<p>has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO20491
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing in response to the Issues and Options consultation.</p> <p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The</p>

	<p>shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20539
Full Name	DR Brigitta Case
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p>

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure

used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Berkhamsted Citizens response

Has the Council considered all reasonable alternative levels of growth?

Yes but

- Have not considered the rejected options properly. See Q16 (see copy below)
- See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the "cart before the horse".

Question 16

Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

- 1 **D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure**
 - The starting point should be the Urban Capacity that doesn't require any Green Belt release
 - The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity
 - DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.
 - 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.

Include files

Number

Question 35

ID	LPIO20586
Full Name	Christine Manning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. See Q16 (copy below) • See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the “cart before the horse”. <p>Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?</p> <p>1 D) 476 Urban Capacity with a figure of less than 602 as per the Government’s draft figure</p> <ul style="list-style-type: none"> • The starting point should be the Urban Capacity that doesn’t require any Green Belt release • The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity • DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply • 1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed the consultation paper clearly offers a 2-year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.

Include files	
Number	Question 35
ID	LPIO20658
Full Name	Jane Hawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20714
Full Name	Keiron Wybrow
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO20762
Full Name	Christopher Townsend
Company / Organisation	
Position	Councillor, Tring Town Council
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)

See the response to Q33 & Q34 above

[Response to Q33: In light of the Government's white paper 'Planning for the right homes in the right places' Options 1 and 3 appear logical. Whilst recognising the pressure being faced by the Planning Team, the options being considered should have reflected more closely the levels of growth that can be achieved sustainably (See Q16).

Option 2 follows what one could call the accepted norm in terms of the procedural steps to take when deriving a figure. What is questionable is whether due consideration has been given to the Borough's ability to absorb the quoted figure because of the amount of land with Green Belt status and the Chilterns A.O.N.B.

That AVDC is taking allocations from High Wycombe and Chiltern District Councils because of similar constraints is germane. There is no evidence that Dacorum has actively explored the potential of exporting a large proportion of the calculated growth to other less constrained areas of Hertfordshire or other authorities.

Such discussions should have taken place before the Issues and Options consultation. There should also be clarity on the possible inclusion of the Crown Estate development adjacent to Hemel Hempstead within St Alban's.

That the Issues & Options consultation is being conducted without including what could be the most realistic housing option calls into question the validity of the exercise. Consequently these are not the most reasonable options to consider.

[Response to Q16: The locally assessed housing need figure (756) fails to take into account the constrained nature of land availability in Dacorum because of Green Belt and A.O.N.B.

A figure should be derived that reflects the ability of the Borough to deliver the housing growth and the necessary infrastructure ("organic growth"). Whilst respecting the Government's policy to provide a major boost to the housing market, a blanket imposition of a target without consideration of local circumstances is irresponsible.

As an example of the alternative basis suggested, the following calculation is based upon the assumption that the maximum number of houses that each group in the settlement hierarchy can take sustainably is the minimum figure quoted in option 1:

1,750 Hemel Hempstead Option 1A

- 1,200 Berkhamsted & Tring Option 1A
- 850 Bovingdon, Kings Langley & Markyate Option 1C
- 3,800 Total or 640 dwellings pa.

The assumption is probably weakest in relation to Hemel Hempstead, which probably have a greater capacity to absorb housing. Taking the 2,980 figure quoted in option 1b the total contribution increases to 5,030 or 694 dwellings per annum.

Closer engagement with local communities at the beginning of the planning process would enable a

	<p>realistic assessment of the potential contribution each settlement can make.]]</p> <p>[Response to Q34: The 'Urban Capacity' option</p> <ul style="list-style-type: none"> • The Brownfield Register will not be published until 2018. Current data was collated from the existing data sources of Dacorum's Strategic Housing Land Availability Assessment (SHLAA), existing planning permissions and pending planning decisions. Once the results of the call-for-sites in are and the new register is published the figures used are in question • That a deficit relative to housing need can be considered an 'exceptional circumstance' is in doubt given recent Government statements • A clear and accepted policy on when it can be deemed that Green Belt does not meet the Government's tests for such a designation is needed <p>With an answer to the points above one will have a realistic option available for consideration.]</p>
Include files	
Number	Question 35
ID	LPIO20810
Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO20856
Full Name	Mr Iain Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.</p> <p>Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p>

No

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1

	<p>person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p>
Include files	
Number	Question 35
ID	LPIO20932
Full Name	Mr Jake Storey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I live in Berkhamsted and have witnessed the size of the small town growing in an unsustainable manner. As a result I joined SYBRA and also now BRAG. I have attached the BRAG response to your proposals</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure,

environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

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Include files	
Number	Question 35
ID	LPIO20987
Full Name	Mr & Mrs J.D Battye
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents' Action Group (BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG's responses under our names so that a complete repetition of BRAG's submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council's submission.</p> <p>Q33 to Q38. BRAG. We fully support BRAG's devastating analysis on what is the paramount issue before us.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need.</i>"

These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Government’s recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Berkhamsted Town Council response

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored.

A higher level of urban capacity for Hemel Hempstead (above the assumed figure of 8900) should be examined. This should take into account recent government statements encouraging the use of high rise buildings in appropriate locations

Include files	
Number	Question 35
ID	LPIO21072
Full Name	julie owen
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO21137
Full Name	Sheron Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of</p>

	<p>exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LP1021213
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • DBC has not considered the rejected options properly and conducted insufficient analysis • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However, with BRAG, I would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he

requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that I, together with BRAG have grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, we contend that the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

Include files	
Number	Question 35
ID	LPIO21261
Full Name	Sarah Lightfoot

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be taken into account. I strongly support their submission (below)</p> <p>The Urban Capacity options plus any greenfield sites that do not harm the nationally designated landscape of the Chilterns AONB or its setting would have merit. The capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number. The growth level should be informed by sustainability appraisal and assessment of the cumulative effects on development on the Chilterns AONB, including effects on natural beauty, ecology, habitat fragmentation, air quality, tranquillity, water abstraction from chalk streams, visitor pressure etc. Please see the recently published guidance from the Chilterns Conservation Board: Position Statement on Cumulative Impacts of Developments on the Chilterns AONB which should be of assistance in identifying effects and assessing them, it is available online at http://www.chilterns.org/conservation/development/positionstatement</p>
Include files	
Number	Question 35
ID	LPIO21336
Full Name	Antony Harbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p>

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
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	used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated
Include files	
Number	Question 35
ID	LPIO21382
Full Name	Helen Kington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at

pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

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Include files	
Number	Question 35
ID	LPIO21499
Full Name	Hightown Housing Association
Company / Organisation	Hightown Housing Association

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Question 35 Has the Council considered all reasonable alternative levels of growth? Yes
Include files	
Number	Question 35
ID	LPIO21562
Full Name	Mrs Valerie Silverton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have read the proposals and strongly agree BRAG's responses.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in

neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Include files	
Number	Question 35
ID	LPIO21619
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence

	<p>Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p>GFRA Response to Question 35, full document attached to question 46</p> <p>With reference to Appendix B of the Issues and Options Allocation Paper it is considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. The shortfall in the approach that has been taken thus far relates 1) To the concentration of Authorities within the South West Hertfordshire Region, discounting the availability and ability for Local Authorities to the west of Dacorum to contribute to housing supply (given significantly lower restricted designations that could be applied to both Aylesbury Vale and Central Bedfordshire's policy designations and 2) It is clear that there has been a lack of substantive discussion with other Local Authorities on exportation of growth given that in Appendix 2 there is even possible discussion in relation to offsetting or exchanging some need with St Albans.</p> <p>It is our opinion that the significant restrictive designations that apply to the Borough of Dacorum have not been applied in negotiation with other Authorities and the ability for other Authorities to take on a level of growth should be reviewed, especially if the alternative is to bring forward unsustainable growth that offers irreparable harm to unprepared settlements within the district.</p>
Include files	
Number	Question 35
ID	LPIO21637
Full Name	Jorn Peters
Company / Organisation	Greater London Authority
Position	Senior Strategic Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The consideration of longer term historic migration trends in the South West Hertfordshire Strategic Housing Market Assessment is welcomed. The Council should note that our latest population and household projections are now also available on the London Datastore:

	<p>https://data.london.gov.uk/dataset/2016-based-projections-national-outputs</p> <p>These projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft London Plan, which we are consulting on until 2 March 2018.</p> <p>The Council has assessed different levels and distributions of growth, and we would welcome the further consideration of options designed to meet the identified housing need. We would also encourage cooperation with St Albans Council to resolve cross-boundary matters on growth figures.</p>
Include files	
Number	Question 35
ID	LPIO21719
Full Name	Roger Saller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perspective on what made the town attractive and what is now at risk.</p> <p>It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. However the figure of 476 underestimates the amount that can be achieved within urban boundaries. Yes Local Authorities have to calculate housing need but then Government policy states "<i>Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.</i>" DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a</p>

minimum of three years housing supply and, with increased density numbers in appropriate areas, this would bring the numbers up to or very close to the 'draft Government figure'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated. DBC have not considered the rejected options properly.

BRAG response

- Have not considered the rejected options properly
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints

	<p>of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt</p> <p>One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated</p>
Include files	
Number	Question 35
ID	LPIO21831
Full Name	W Lamb Ltd
Company / Organisation	W Lamb Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> For the reasons discussed in response to Question 16, it is considered that the Council should be considering a growth option based on a minimum OAN of 800 homes per year.
Include files	
Number	Question 35
ID	LPIO21902
Full Name	Louis Quail
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not

explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the argument for building on greenbelt land should only be one of last resort, there are plenty of other options left before launching off this one way route.

Berkhamsted Residents Action Group response:

- Have not considered the rejected options properly.
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG "Planning for the right homes in the right places: consultation proposals" with paragraph 9 stating that "*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*" Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the

	<p>Governments recent strong commitments to preserving the Green Belt.</p> <ul style="list-style-type: none"> • One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 35
ID	LPIO21937
Full Name	Roger Saller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perceptive on what made the town attractive and what is now at risk.</p> <p>BRAG response to Question 35 (please note full document is attached to Q46)</p> <p>Question 35 <i>Has the Council considered all reasonable alternative levels of growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that

figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity

- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated

Include files	
Number	Question 35
ID	LPIO21971
Full Name	Thomas and Margaret Ritchie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council's response: See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored.</p> <p>A higher level of urban capacity for Hemel Hempstead (above the assumed figure of 8900) should be examined. This should take into account recent government statements encouraging the use of high rise buildings in appropriate locations.</p>
Include files	
Number	Question 35
ID	LPIO22048
Full Name	Gallagher Estates
Company / Organisation	Gallagher Estates
Position	
Agent Name	Mrs Hanna Staton
Company / Organisation	Pegasus Group
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The following answer response to the three questions 33,34,35.</p> <p>It is agreed that the three growth levels proposed are more reasonable options than the alternative growth levels considered and, rightly, rejected by the Council. In our opinion, the Council could have considered an alternative option of the SHMA figure adjusted in line with the latest household projections and other suggestions set out in the Housing Evidence Base Review Paper. Should the Revised NPPF not change the policy framework concerning identifying dwelling requirements, then it is suggested that the SHMA is updated to reflect the concerns set out.</p>
Include files	

Number	Question 35
ID	LPIO22083
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further work is required to ensure that the development yield from urban sites, previously developed land and imposition of appropriate higher densities is maximised. Sites identified through preparation of a Brownfield Register (required to be in place by Christmas 2017) will also contribute to a reduction in the need to take greenfield / Green Belt land.</p> <ul style="list-style-type: none"> • Further discussions under the statutory Duty to Cooperate should be held with both Three Rivers and St Albans District Councils in the allocation and delivery of development on the boundary between these authorities. <p><u>QUESTION 35 Alternative Levels of Growth - Summary Representation and Response Sought:</u></p> <p>Further work is required to ensure that the development yield from urban sites, previously developed land and imposition of appropriate higher densities is maximised. Sites identified through preparation of a Brownfield Register (required to be in place by Christmas 2017) will also contribute to a reduction in the need to take greenfield / Green Belt land.</p> <p>Further discussions under the statutory Duty to Cooperate should be held with both Three Rivers and St Albans District Councils in the allocation and delivery of development on the boundary between these authorities.</p>
Include files	
Number	Question 35
ID	LPIO22103
Full Name	Crest Nicholson
Company / Organisation	
Position	
Agent Name	Sarah Moorhouse
Company / Organisation	Lichfields
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	See section 3.0 of the Land at Blegberry Gardens, Berkhamsted (Site Be-h6) - Representations to Dacorum's New Local Plan: Issues and Options (Nov

	2017) document by Lichfields on behalf of Crest Nicholson Chiltern.
Include files	Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Repts (13.12.17).PDF
Number	Question 35
ID	LPIO22149
Full Name	Mrs Hayley Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO22192
Full Name	Mr Peter Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO22237
Full Name	Miss Sophie Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 35
ID	LPIO22431
Full Name	Mr & Mrs J Godfrey
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Mr & Mrs Godfrey:</p> <p>As Berkhamsted residents we have no choice but to say yes to Q40 Option 1B. This Option is for 602 houses per annum in Dacorum with house building in Berkhamsted limited to the current plan of 600 houses until 2036 and no further Green Belt release except around Hemel. As a result we are forced to say No to all the Options and the reasons for this are shown below:</p> <ul style="list-style-type: none"> • The target of 602 house p.a. is based on Dacorum's evidence that this is the best government supported target available. However, we believe a lower target Option should have been included in the Consultation document (see fourth bullet below). • Hemel is the only town where infrastructure is available and can be properly planned • As stated in Berkhamsted's Town Council draft reply all other Options mentioned "...would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to Q7)". • In this Consultation no current information has been provided to properly evaluate any of the Options in terms of what these new higher housing numbers mean for cost or timing of Infrastructure delivery. The documents referenced as evidence and relating to Infrastructure are out-dated and more importantly not based on these hugely increased housing projections. Physical evidence of existing infrastructure clearly shows that most of Dacorum is at capacity and does not meet current demand e.g. Berkhamsted Multi Storey Car Park in 2020 will struggle to meet today's demand and certainly existing entry/exit roads will be unable to cope. • All Options shown have been poorly selected and flawed. For example, Option 3, 1000 houses per annum, should not have been included as your document explains it would be an imposed target and without basis. Rather than providing this wholly unrealistic Option, the current urban capacity was totally dismissed even though it is significantly higher than the current Core Strategy and would have been a credible defensible Option and better start point (reality!!). This leaves only two possible Options but both were presented in a highly misleading and discriminatory manner. Compare the description and house building levels in • Option 1A "Focussed on Three Towns" showing houses in Hemel (8900 plus 1750 from Green Belt) Berkhamsted (600 plus 900) and Tring (500 and 300) and • Option 1C "Spread More Evenly Across the Borough" with a <u>significant reduction</u> in Hemel

(8900 with 0 Green Belt) and significant increases in Berkhamsted (600 plus 1075) and Tring (500 and 1000)!!!!

Clearly building is not “Spread More Evenly” in Option 1C – it should have been re-titled as “Focussed on Two Market Towns & Settlements” and from their inclusion had never been intended to be progressed. There is a similar example with Option 2C which should similarly be discounted for undue bias. The impression is that the Consultation is lead more by developers’ proposals of “Call for Sites” and less to do with independent sustainable town planning.

- The proposed house building target of 758 p.a. in Option 2, based on the 2016 South Herts Market Assessment, is outdated and the results are disputed by St Albans. This huge jump in house-building needs to be re-visited to reflect current underlying assumptions (London market growth?). Also while mention is made of the methodology of the calculation it does not provide;
- a comparison of affordable homes within the current Plan and the proposed new Plan and how/where this difference could be met in the future with less release of land.
- a realistic approach to affordable homes. Dacorum’s Consultation Boards showed all possible Green Belt sites as requiring 40% affordable homes. However, there is no evidence to support this being consistently achieved and certainly not on all the proposed sites. How this discrepancy is being reflected in the Local Plan is not discussed.
- an update to reflect where we are in the economic cycle and also whether there is sufficient house building capacity long term. As an example, in August 2017 brick producer Ibstock (40% UK brick market share) said that in March 2017 the UK brick industry delivered more bricks than it had for nine years. However, despite the increase in deliveries, some builders and builders’ merchants are seeing lead times lengthen.” With an estimated 80% of new homes using bricks within their construction plus a known existing construction labour shortage DBC should be basing house-building on long term achievability and not panicked by developers into making early release of Green Belt based on dubious house-building growth projections.
 - Option 2 cannot be subject of further consideration without including a new large development extension of Hemel (2500+houses) and the likely impacts from the Gorhambury development. To ignore some estimate of these effects is unsatisfactory.

the significant proposed Green Belt releases do not address important local topographical differences or issues such as the recent developer targeted overbuilding in Berkhamsted and underbuilding in Hemel

Include files

Number	Question 35
ID	LPIO22461
Full Name	Ashleigh Michnowiec
Company / Organisation	Harrow Estates plc
Position	
Agent Name	Mrs Sam Ryan
Company / Organisation	Turley Estates
Position	Director
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In the context of the most up-to-date data available and uncertainties around the methodology for calculating the OAN for housing it is considered that the Council should reasonably consider growth options around the current Option 3.</p> <p>In accordance with the conclusions set out in the Turley Local Needs Assessment these options should not consider providing for a level of housing below 900 dpa. They should also consider the potential for housing needs to exceed 1,100 dpa, as per our comments provided in response to question 34.</p>
Include files	
Number	Question 35
ID	LPIO22516
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below)</p> <ul style="list-style-type: none"> • Have not considered the rejected options properly. • It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity. • The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based

on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that “*Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.

- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

Include files	
Number	Question 35
ID	LP1022566

Full Name	Mrs C Longbottom
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I support all answers and comments to the Issues & Options Consultation document noted on the Berkhamsted Town Council website</p> <p>See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored.</p> <p>A higher level of urban capacity for Hemel Hempstead (above the assumed figure of 8900) should be examined. This should take into account recent government statements encouraging the use of high rise buildings in appropriate locations.</p>
Include files	
Number	Question 35
ID	LPIO22636
Full Name	Mr & Mrs Mehew
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We write as residents of [REDACTED]</p> <p>[REDACTED]</p> <p>in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) (see comments LPIO18384, 18385) and the draft response prepared by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council Response:</p> <p>See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored.</p> <p>A higher level of urban capacity for Hemel Hempstead (above the assumed figure of 8900) should be examined. This should take into account recent government</p>

	statements encouraging the use of high rise buildings in appropriate locations.
Include files	
Number	Question 35
ID	LPIO22653
Full Name	Ms Wendy Halford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I now understand that the requirement for expansion and new homes is coming from the Central Government, and that your position is that Dacorum has no choice but to implement a plan, and it is better to do that carefully, rather than refuse, and then be subject to Central Government dictating where developments spring up. That makes sense
Include files	
Number	Question 35
ID	LPIO22713
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<i>Question 35 – Has the Council considered all reasonable alternative levels of growth?</i> No comment
Include files	
Number	Question 35
ID	LPIO22821
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	The term “locally assessed need” should not be used, because no research is presented in the consultation into the actual needs of local residents for <ol style="list-style-type: none">1 a) housing which young people leaving home can afford and2 b) homes for older people seeking to downsize.
Include files	

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	395
Filtered Respondents	390
Questions	<p>Question 36</p> <p>Do you support the proposed locational principles?</p> <p>Yes / No</p> <p><i>If no, please explain your reasons, with reference to evidence where available.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	ID-4764272-QUESTION-36
Pivot	<i>(none)</i>
Document Name	Question 36 - Summary Report
Created on	2019-04-23 09:37:21
Created by	Strategic Planning Admin

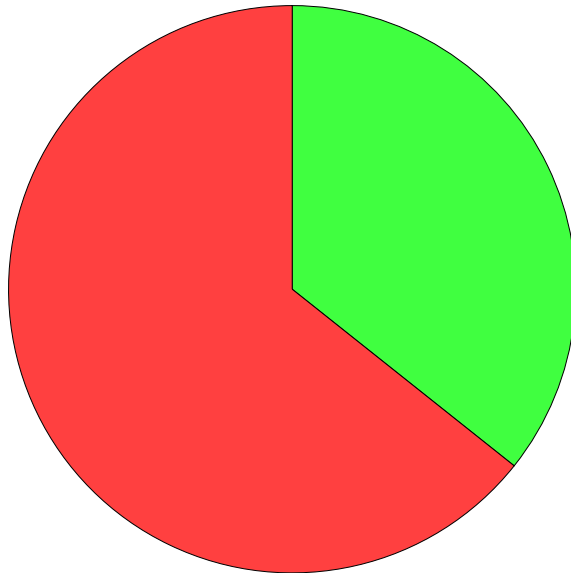
Your Opinion

Question responses: **395 (100.00%)**

Question 36

Do you support the proposed locational principles?

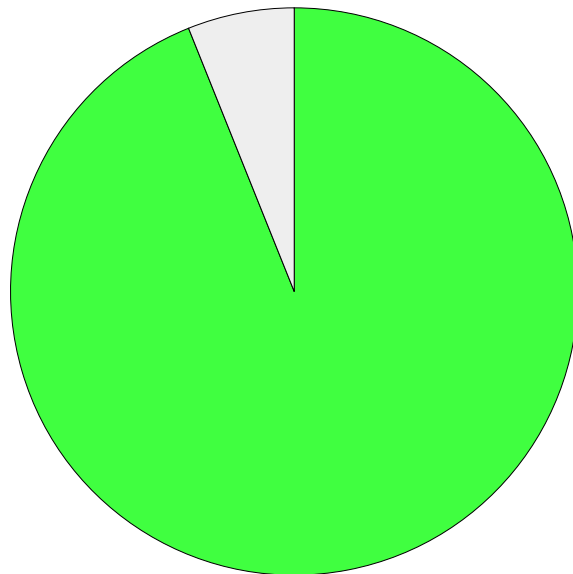
Yes / No



	% Total	% Answer	Count
Yes	35.70%	35.70%	141
No	64.30%	64.30%	254
Total	100.00%	100.00%	395

Responses

Question responses: **371 (93.92%)**



	% Total	% Answer	Count
Responses	93.92%	100.00%	371
No Response	6.08%	--	24
Total	100.00%	100.00%	395

Supporting evidence

Question responses: 2 (0.51%)



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	0.51%	100.00%	2
■ Responses with No Uploads	99.49%	--	393
Total	100.00%	100.00%	395

Issues and Options All Responses to Question 36

Number	Question 36
ID	LPIO25
Full Name	Mrs Jennifer Ponsford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I do support these principles however I think there is a little too much emphasis on protecting local character - something which is hugely difficult to define and changes over time. For example, the core of Berkhamsted is old Victorian and Edwardian housing build at approximately 80 dph. Much of the new development is just 20-30 dph but has been allowed to be build. Which do you deem as 'local character'? the demographic of the town has changes over time as wealth people move out of London to raise families nearer to the country side, often pricing local people out of the market. It is a fact of life that the character of an area changes over time - this can be both a good and bad thing - this is what regeneration is! Exercising caution on this point would be sensible.
Include files	
Number	Question 36
ID	LPIO103
Full Name	Mr John Lilley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO226
Full Name	Mr Martin Cotton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	Protecting the character of towns and villages is very important, as is preventing urban sprawl. When push come to shove, these principles must be guarded robustly.
Include files	
Number	Question 36
ID	LPIO279
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I agree with the principles as stated but would suggest your proposals of developing (some might say OVER-developing) Kings Langley, goes against them entirely. Perhaps they should say: <ul style="list-style-type: none"> - go for green belt land - go for urban sprawl - strip away the landscape and build on it - let's assume no one has a car!
Include files	
Number	Question 36
ID	LPIO349
Full Name	Mr David Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The principles are excellent, but they do not seem to have been adhered to in the plan. Green belt, flooding and character and value of landscapes appear to have been rejected.
Include files	
Number	Question 36
ID	LPIO469
Full Name	Ms Julia Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO481
Full Name	Mr Robert Spence
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building on Green Belt land should not be in the mix.
Include files	
Number	Question 36
ID	LPIO553
Full Name	Mrs Sarah West
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO625
Full Name	Mrs Daphne Woodrow
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO688
Full Name	Mr David Smith
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I agree all but the principle detailed below</p> <ul style="list-style-type: none"> Maximise the density of development, whilst ensuring it reflects local character. <p>Maximizing the density will lead to more 1 and 2 bed apartment blocks - we need to build homes with some outside space and gardens. The homes we build now will most likely last for hundreds of years so lets build homes that are pleasant to live in. This may mean using a little more land (even green belt!) to build good quality housing stock.</p> <p>As an example Hemel is largely made up of 1950/60s New Town Commission homes which are nice family homes - these are what we need more of, not more apartment blocks</p>
Include files	
Number	Question 36
ID	LPIO741
Full Name	Mr John Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>All the above principles are very laudable but there should be no development of green belt land and genuine consideration must be given to the inevitable strain this is going to put on the road network. Each house will have on average two cars or more cars despite all the conciliatory words to the contrary and they will use them and park them somewhere..</p>
Include files	
Number	Question 36
ID	LPIO746
Full Name	Mr Scott Wiggins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	The principles are generally sound, however the execution of these principles is flawed. For instance, proposing that new housing developments within the inner village of Bovingdon where the road infrastructure does not support the volume of traffic currently let alone if hundreds of houses are added is an absurd idea and does by no means follow these principles set out. The locations at Bov-h2 and Bov-h3 bordering Green Lane with access via Homefield and Louise Walk should not be part of this spatial strategy and other sites such as Bov-h1 and Bov-h4 on the outskirts of the village with more appropriate road access should be considered where they have more room for expansion and growth into other areas on the outer edges of Bovingdon (i.e. fields adjacent to Leyhill Road, Bovingdon Market, adjacent to the prison on Chesham Road / Hempstead Road) - see attachment 'Bovingdon Housing Strategy_Objections_Comments_20171201'
Include files	Bovingdon Housing Strategy_Objections_Comments_20171201
Number	Question 36
ID	LPIO772
Full Name	Mrs Elizabeth Ward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes I support the principles; however the proposed plans at Tring seem to disregard the majority of these. In particular, proposing Tr-h4 and Tr-h1 as locations does not 'maximise the use of brownfield land for development' or 'protect the character and value of important landscapes, heritage and biodiversity.' These areas are largely Green Belt adjacent to AONB and building here would irrevocably alter the landscape in the direction of the Ivinghoe Beacon. The land north of Station Road is at risk of flooding, as has been evident at the existing Ivy Cottage at the canal end in recent years. Additionally to aesthetics, situating the proposed houses at these sites because of their proximity to the station with little regard for infrastructure constraints, from what I can establish, in particular schools and medical provision is unacceptable. I agree that some affordable housing is required but the plan for the Tring area needs to be reduced and rethought to respect the heritage of the land and the people who already live in the community. Green Belt and

	AONB areas should be respected and the yard sticks should not be moved for convenience.
Include files	
Number	Question 36
ID	LPIO826
Full Name	Mrs Karen Bevan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As long as they are REALLY taken into account. From the locations and densities of housing in these proposals it looks like the opposite is happening.
Include files	
Number	Question 36
ID	LPIO846
Full Name	Mrs Valerie Lee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Only Option 1A of this review is acceptable as far as KINGS Langley residents should be concerned.
Include files	
Number	Question 36
ID	LPIO873
Full Name	Mr Stephen Bevan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Only if they are really taken into account. From the location and the densities of housing in the proposals it looks like the opposite is happening.
Include files	
Number	Question 36

ID	LPIO889
Full Name	Mr Ian Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As the principles do not include the important phrase " within urban capacity"
Include files	
Number	Question 36
ID	LPIO942
Full Name	Ms Stephanie Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The principles are sound but your proposed developments will violate them.
Include files	
Number	Question 36
ID	LPIO943
Full Name	Ms Stephanie Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The principles are sound but your proposed developments will violate them.
Include files	
Number	Question 36
ID	LPIO992
Full Name	Mrs Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I support the locational principles, but I don't see how they can be adhered to with the huge amount of new houses you are proposing to build.
Include files	
Number	Question 36
ID	LPIO1027
Full Name	Mr Dominic Lawrance
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The principles are generally fine, but they do not seem to have been adhered to in the plan. In many cases, the proposals do not locate development at sustainable locations, do not respect the character of existing settlements, do not make any attempt to restrict urban sprawl, do not protect the character and value of important landscapes, and have little regard to whether the necessary infrastructure is there to support the additional population.</p> <p>I also disagree that the density of developments should always be maximised. In some cases it is impossible to avoid damage to local character with high density development, whereas a lower density development may be accommodated with much less visual impact and strain on local resources.</p>
Include files	
Number	Question 36
ID	LPIO1049
Full Name	mr Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO1112
Full Name	Ms Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A key principle should be to protect Green Belt and the environment.
Include files	
Number	Question 36
ID	LPIO1246
Full Name	Mrs Hazel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Bovingdon is a Village!! Do not turn it into a town, we are already struggling with the amount of cars on the road chopping into greenbelt will b absolutely detrimental to our village! Pollution will increase, noise will increase, wildlife will be eradicated, school credential will all plummet!
Include files	
Number	Question 36
ID	LPIO1284
Full Name	Sarah Harper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	If they were actually applied then yes I agree. But I struggle to see how these are met with the proposed development in Green Belt land.
Include files	
Number	Question 36

ID	LPIO1304
Full Name	Mrs Angela Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But your plans do not mirror these objectives, especially 'protect the character and value of important landscapes, heritage and diversity'. Berkhamsted is a historic town, with areas of beauty and character, which is being ruined by trying to cram too many people into it, building ugly car parks which will only add to the congestion in the town when getting in and out, and building on the green belt extensively..
Include files	
Number	Question 36
ID	LPIO1330
Full Name	Mrs Karen Barnes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I do support these principles. Please use and apply them to all options for housing.
Include files	
Number	Question 36
ID	LPIO1338
Full Name	Mrs Catherine Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Hemel Hempstead should be developed in the first instance and if there is the need in the future for further development that Hemel Hempstead could not accommodate then and only then should the market towns of Berkhamsted and Tring be considered. Villages should be left alone and so should Green Belt land.

Include files	
Number	Question 36
ID	LPIO1413
Full Name	Mr Matt Clarke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites first & Compulsory purchase of suitable land next. Inadequate planning plus creation of series issues due to lack of infrastructure in areas planned for significant development.
Include files	
Number	Question 36
ID	LPIO1414
Full Name	Mr Matt Clarke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites first & Compulsory purchase of suitable land next. Inadequate planning plus creation of series issues due to lack of infrastructure in areas planned for significant development.
Include files	
Number	Question 36
ID	LPIO1461
Full Name	Mr Brian Rook
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It is misleading in section 10.2.2 to imply that the proposed new housing areas are likely to be part of "a few areas which don't meet all of the criteria and so could have their Green belt designation removed". This is incorrect - in particular none of the proposed sites in Tring are considered by the Green Belt review report

	(section 8.2) as being a "sub-area contributing least to Green belt purposes"
Include files	
Number	Question 36
ID	LPIO1511
Full Name	Mr Chris Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposals contradict the principals as all brownbelt sites should be used first. You would not be protecting the character of important landscapes by building on greenbelt land. Kings Langley and Bovngdon don't have the infrastructure to take such large scale housing.
Include files	
Number	Question 36
ID	LPIO1583
Full Name	Linda Hattersley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes, these principles are great BUT the growth plans go against so many of them !
Include files	
Number	Question 36
ID	LPIO1639
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But they cannot be achieved with these proposals.
Include files	
Number	Question 36

ID	LPIO1679
Full Name	Jenny Thorburn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But the proposals elsewhere in the document seem to contradict these principles. Also a principle of respecting existing land designations ie Greenbelt should be added.
Include files	
Number	Question 36
ID	LPIO1717
Full Name	Ms G Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You need an extra bullet point. <ul style="list-style-type: none"> No building on Green Belt Land
Include files	
Number	Question 36
ID	LPIO1818
Full Name	Mrs Pamela Kingsland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Because I cannot see how this will be obtained without building on greenbelt land.
Include files	
Number	Question 36
ID	LPIO1900
Full Name	Mr Richard Case
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC does not take fully into account all relevant aspects. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO1930
Full Name	ms V Earle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Development should be concentrated around towns where infrastructure can support high density low cost housing. Directing development towards villages destroys the green belt. Villages and associated infrastuc cannot support high density housing.
Include files	
Number	Question 36
ID	LPIO2041
Full Name	Mrs Christine Mabley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Density of development needs to be controlled by sustainable levels of transport and infrastructure, most particularly water, especially at the fringes of towns or villages. If not it is simply urban sprawl and threatens to engulf what would otherwise be separate settlements. There needs to be a robust hierarchy of policies or there is clear contradiction in aims.
Include files	
Number	Question 36
ID	LPIO2080

Full Name	Mr Christopher Giddings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The council insistence of maximising density of development leads to small houses and small gardens. Whilst this may deliver the highest number of houses on the smallest plot of land, it does not consider that families want high quality houses with enough space both inside and out.
Include files	
Number	Question 36
ID	LPIO2101
Full Name	Mr Neale Dale
Company / Organisation	
Position	
Agent Name	Mr Andrew Boughton
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Yes but with significant qualifications.</p> <p>(1) Locational principles should not be pursued as a dogma, for instance it is entirely incorrect to assume that car use (miles travelled) are predominantly a function of location. It is not. Miles travelled are related to the type of household concerned. There is significant research to show that miles travelled by car <u>increase</u> according to household income to a factor of four (wealthiest quintile of households to poorest quintile) unless the household is located close to a railway station when car use by the richest households fall away presumably in favour of rail transport. Bus use has the opposite correlation, lower income = more use of buses.</p> <p>(2) Representations elsewhere in support of Care Village development (market C2 housing) demonstrates that locational principles can be suspended where such development brings other benefits to the wider community and - because such developments have significant on site provision of amenities and care provision, with tailored transport for staff and residents, have to be treated on their own merits. This approach is important if the plan is to be justified and effective.</p> <p>The sustainability benefits of a typical care village are set out in a study by ECV (part of the Inspire Villages Group) attached to this submission.</p>

Include files	BB Architecture and Planning Ltd - Inspire Retirement Village Group submission and supporting Docs.pdf
Number	Question 36
ID	LPIO2121
Full Name	Mrs Caroline Jarrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The proposal to develop site Be-h3 (Ivy House Lane) is not consistent with these principles, particularly:</p> <ul style="list-style-type: none"> - locate development at well-connected sustainable locations; - protect the value and character of important landscapes, heritage and biodiversity; - ensure that new development can be served by necessary infrastructure.
Include files	
Number	Question 36
ID	LPIO2152
Full Name	Mr Simon Ware
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No mention of the need for the Local Plan to protect the Greenbelt in the long term, which is a requirement of the NPPF.</p> <p>5 year housing supply target from Government needs to reflect the constraints placed on it from the Greenbelt, which may restrain the ability of the authority to meet its housing target (House of Commons Briefing Paper. Nov 2017. Green Belt).</p>
Include files	
Number	Question 36
ID	LPIO2200
Full Name	Mrs Karen Mellor
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I do support the first 8 of the proposed locational principles.</p> <p>I do NOT support number 9. I do not think that Dacorum should pander to central Government. Central Government should be developing industry and growth in the North and thereby housing to accomodate it where there is plenty of housing stock and space, in order to take the pressure of off the South East. This does not mean that I support the white elephant that is HS2.</p> <p>I agree with one of the other respondents regarding no building on Green Belt with the qualification that it should be</p> <p>No Building on Green belt Land that provides a barrier for pollution, prevents coalescence and provides environmental, ecological and health benefits, walking etc.</p>
Include files	
Number	Question 36
ID	LPIO2221
Full Name	Mrs Melanie Flowers
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But avoidance of green belt development should also be included in order to prevent urban sprawl and safeguard our countryside and our villages.
Include files	
Number	Question 36
ID	LPIO2345
Full Name	Mr George Bull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The locational principles seem entirely acceptable. However, the reality for Tring where almost all of the proposed development will take place on Green Belt is a complete travesty of all those principles.
Include files	
Number	Question 36

ID	LPIO2500
Full Name	Mr Timothy Copeman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO2600
Full Name	Mr Paul Crosland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am concerned by the statement that "current evidence suggests that the Green Belt within Dacorum is *largely* fulfilling the role for which it was designated, however there are some areas that have been identified as not fully meeting all the Government's criteria for designation." As noted in my response to Q.9 in which I have said I believe there is a bias towards identifying areas of land which may be considered favourable to release from Green Belt and then finding reasons to demonstrate why those areas might be considered for removal.
Include files	
Number	Question 36
ID	LPIO2630
Full Name	Mr John Morrish
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It does not mention green belt sacrifice. This should be the first bullet point stating that this could only be considered once all other options have been thoroughly exhausted and only in genuinely exceptional circumstances. There is enough non green belt to more than adequately meet the government target.

Include files	
Number	Question 36
ID	LPIO2670
Full Name	Mrs Sue Lower
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Has any thought gone into the expected demographic makeup in each proposed development location as this would have a significant effect on the type of infrastructure needed to support that development? I would have expected this to have been a consideration particularly given recent national studies showing an aging population over the next 20 years.
Include files	
Number	Question 36
ID	LPIO2686
Full Name	Mr Alan Andrews
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Do not support this as I means destruction of valuable greenbelt
Include files	
Number	Question 36
ID	LPIO2715
Full Name	Mr Norman Allan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This is not respecting the character of Kings Langley Village and restricting Urban sprawl. In addition it is not ENSURING necessary infrastructure.
Include files	

Number	Question 36
ID	LPIO2744
Full Name	Mr James Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You missed one point. To EXCLUDE the development of green belt land
Include files	
Number	Question 36
ID	LPIO2811
Full Name	Mrs Carol Chandler
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO2829
Full Name	mrs Gillian Hooper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	These principles are sound, but NOT reflected in proposals.
Include files	
Number	Question 36
ID	LPIO2891
Full Name	Mr Antony Harbidge
Company / Organisation	Berkhamsted Residents Action Group (BRAG)
Position	Chairman
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO2927
Full Name	Mr Kenneth Watts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I would have liked to say 'Yes' except for the last bullet point, which I strongly suspect will trump all the others as it is what the government wants at any cost.
Include files	
Number	Question 36
ID	LPIO3014
Full Name	Mr Paul Stanbridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	If rigorously applied and independently assessed.
Include files	
Number	Question 36
ID	LPIO3056
Full Name	Mr Ivor Eisenstadt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	To achieve locational principles will lead to the conclusion that option 1B id the most appropriate.
Include files	
Number	Question 36
ID	LPIO3105
Full Name	mr hugh siegle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Add' Green Belt land to be used in exceptional circumstances only'
Include files	
Number	Question 36
ID	LPIO3116
Full Name	Mr John Whiteman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Respecting the Green Belt should be an additional criterion
Include files	
Number	Question 36
ID	LPIO3202
Full Name	Mrs Juanita Mann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes EXCEPT maximising density of housing. Large areas of housing need to be better planned ie. include play areas for small children, corner stores / surgery / pharmacy. Build a community not just a dormitory area. This might also reduce car usage a bit
Include files	
Number	Question 36

ID	LPIO3286
Full Name	
Company / Organisation	Premier Property Acquisition
Position	
Agent Name	Mr Jonathan Buckwell
Company / Organisation	DHA Planning
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In general terms we have no objection to the principles set out, so long as it is recognised that whilst every sensible opportunity for brownfield development should be maximised, this should not preclude greenfield or, where agreed to be appropriate to be removed from the designation, current Green Belt sites coming forward where these are sustainably located and can deliver housing at an early opportunity.
Include files	
Number	Question 36
ID	LPIO3347
Full Name	Mr Richard White
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Only option 1B would comply with these locational principles
Include files	
Number	Question 36
ID	LPIO3400
Full Name	Mrs Diana Calderwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	All the above but 'Protect Green Belt land and AONB - should be emphasised' (this land should not be considered for new build). Hemel as a 'new town' should take the increased capacity.
Include files	

Number	Question 36
ID	LPIO3450
Full Name	Mrs Ann Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In part the principles are good but they do not go far enough.</p> <p>Despite having them you have still put forward 4 sites all on green belt lan, around an historic village liable to flooding with overstretched infrastructure.</p> <p>Your plan also goes against respecting the existing settlement and promotes its urban sprawl and would ruin our landscape, heritage and biodiversity. It also falls short on urban regeneration.</p> <p>Basically you haven't followed any of the principals in the corner of Dacorum</p>
Include files	
Number	Question 36
ID	LPIO3492
Full Name	Mrs Louise Saul
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Agree but they seem at odds with the proposals to build on greenbelt
Include files	
Number	Question 36
ID	LPIO3595
Full Name	Mrs Sandra Jackson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>You state "Respect the character of the existing settlement pattern and restrict urban sprawl" but you are proposing four sites in Kings Langley, which will change us from a village into a small town, and change the character of this area irretrievably for the worse.</p> <p>Further you state "Protect the character and value of important landscapes, heritage and biodiversity. Ensure that new development can be served by necessary infrastructure" And you have failed to show that you will do either of these points by allocating four proposals within the Kings Langley Parish boundary.</p> <p>You state "Locate development to help support delivery of a 5 year housing land supply, as required by Government" except Government does not require redesignation of Green Belt and is in fact working now to protect green areas to prevent urban sprawl.</p> <p>You should be urged to reconsider the developments you are proposing in the light of new guidelines from Government.</p>
Include files	
Number	Question 36
ID	LPIO3670
Full Name	Mr Gruff Edwards
Company / Organisation	Dacorum Environmental Forum Waste Group
Position	Chair
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No. To invoke the Government's recently concluded consultation "The Right Homes in the Right Places", the "Right Homes" are for those people living in Dacorum in need of homes. There are currently around 5600 households on DBC housing list (The Gazette, November 8th 2017, page 2), and even including the "B list" this number would be about 11200 (The i newspaper, Monday 23rd October). The potential for developing on non-green belt housing sites in Dacorum ("Identified housing capacity") is about 11000 houses, (DBC Local Plan, November 2017 page 94)) meaning that very few homes need to be built on green belt land.</p> <p>In order to address the housing crisis, the "Right Homes" are not those unaffordable by people in housing need, and that can only be purchased by those that are moving up the housing ladder. Neither is it necessary or desirable to build non-affordable homes in the Borough to attract people from other areas.</p> <p>The "Right Place" is not the Green Belt, and indeed the Communities Secretary Sajid Javid has said "There is no need to build on green belt land" (The i newspaper, Monday 23rd October).</p>
Include files	
Number	Question 36

ID	LPIO3725
Full Name	MS Nicola Hutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>On reading these principles they seem to be reasonable. So why is consideration being given to the development of Green belt sites?? The proposed 900 houses and a school at shendish manor will lead to increased urban sprawl and merging of Apsley, hemel hempstead with Kings Langley. The proposed envelopment of wayside farm for Office, industrial development and 2000 houses again leads to urban sprawl.</p> <p>I have grave concerns that green belt land is being considered as a first resort. I suspect that it is easier and more profitable to developers to build on precious green belt and I am not reassured that all brownfield sites are being considered and that respect and importance is given to the importance and significance of Green belt aim and purposes.</p>
Include files	
Number	Question 36
ID	LPIO3736
Full Name	Mr Andrew Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO3763
Full Name	Ms Laura Mahlmann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The principles outlined here cannot be achieved and are a contradiction to proposals made in this document where building on green belt land is considered.

	<p>If built on green belt, especially Wayside farm, landscape, heritage or biodiversity are not protected.</p> <p>In KL, we do not have suitable infrastructure to support the proposed number of new houses and associated cars without causing massive disruption to already poorly flowing traffic at peak times.</p>
Include files	
Number	Question 36
ID	LPIO3768
Full Name	Mr Richard Sidwell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The principles are good, but not in keeping with so many more of your proposals including the re-designation of green belt land.
Include files	
Number	Question 36
ID	LPIO3796
Full Name	Mr James King
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Focus on Hemel Hempstead will lead to coalescence. It will soon spread all the way down to the M25 and will merge with Watford coming north. The distinct villages and towns are what has made the area and that is at great threat of being removed.
Include files	
Number	Question 36
ID	LPIO3843
Full Name	Mr Robin Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	They all sound good, but clearly in Kings Langley the village character and ethos will be destroyed by this poorly thought through idea of development, which will remove not only green belt but various scenic areas of the village.
Include files	
Number	Question 36
ID	LPIO3853
Full Name	Mr Anthony Warren
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I don't agree with the simple statement of "Maximise the density of developments, whilst ensuring it reflects local character" Recent developments in Markyate are poorly planned with inadequate space for cars for families in a village, which has changed the character caused by the density of the development. Given house prices and the need for working families in villages requires multiple cars per house must be recognised.
Include files	
Number	Question 36
ID	LPIO3980
Full Name	Mr Tim Varley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO4005
Full Name	Mr John McCombe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The principles are fine but need to be adhered to

Include files	
Number	Question 36
ID	LPIO4160
Full Name	Mr Graham Hoad
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Green belt should be preserved.
Include files	
Number	Question 36
ID	LPIO4170
Full Name	Mr Peter Howard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But your proposals contradict many of these principles!
Include files	
Number	Question 36
ID	LPIO4202
Full Name	Mr Douglas Gurney
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No, because it means building on Greenbelt land and in villages without infrastructure.
Include files	
Number	Question 36
ID	LPIO4262
Full Name	Ms Alison Sams
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Because this cannot be obtained without building on greenbelt.
Include files	
Number	Question 36
ID	LPIO4329
Full Name	Mr Derek Griffin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Obviously the traffic congestion on the A4251 through Kings Langley is already a major issue, which is not being addressed. It would be made infinitely worse if further traffic from proposed housing along the route were added around Kings Langley and Shendish.
Include files	
Number	Question 36
ID	LPIO4393
Full Name	Mr Bruce Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	5 year land supply should exclude Green Belt and Berkhamsted should get relief for being well ahead of its planned build rate.
Include files	
Number	Question 36
ID	LPIO4399
Full Name	Mrs Victoria Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	They are fine principles, but will they be the rule the plans adhere to?
Include files	
Number	Question 36
ID	LPIO4424
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO4490
Full Name	Mrs Alison Williamson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Development should be restricted to Brownfield sites and to those areas where development has already taken place and the infrastructure is there to support it.
Include files	
Number	Question 36
ID	LPIO4533
Full Name	Mr Robert Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This all has to be within urban capacity and topography.
Include files	
Number	Question 36
ID	LPIO4594
Full Name	Mrs Margaret Stanier
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I would add protecting the Green Belt. Many of the proposed areas for development on the Green Belt , according to your assessment, do very much meet the Government's criteria for designation, which is not what is implied in paragraph 10.2.2.
Include files	
Number	Question 36
ID	LP104622
Full Name	Mr John Lunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There should be more focus on expanding Hemel Hempstead rather than the smaller towns and villages.
Include files	
Number	Question 36
ID	LP104651
Full Name	Mrs Caroline Nickalls
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But the proposals conflict with the principals listed above. Development should be concentrated around towns where infrastructure can support high density low cost housing. Protection of Green Belt should be included as a principal. Villages and associated infrastructure cannot support high density housing.
Include files	
Number	Question 36
ID	LP104654
Full Name	Miss Anna Nickalls
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I support the principles, but struggle to see how they can be maintained the whilst building on greenbelt sites.
Include files	
Number	Question 36
ID	LP104658
Full Name	Ms Ann Davies
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Because respecting, protecting and supporting the designation of existing Green Belt sites is not included as one of the principles.
Include files	
Number	Question 36
ID	LP104764
Full Name	Mr Keith Bradbury
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LP104871
Full Name	
Company / Organisation	Watson Howick
Position	
Agent Name	Mrs Julia Riddle
Company / Organisation	Castle Planning
Position	Director
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The text in relation to Locational Principles identifies that there are some areas of Green Belt in Dacorum which are not fully meeting the Government's criteria for that

	<p>designation. As such, although it is recognised that, in principle, the Green Belt should be protected from development, it is also right that there are circumstances where development of Green Belt, which perhaps does not fully meet the criteria and which can bring about other benefits, should be considered as a location for growth. This is particularly the case where it can fulfil other criteria in terms of connections to local services, facilities and infrastructure.</p> <p>As such, the broad locational principles as set out are supported. It is right that development should maximise density, be in well connected, sustainable locations, protect the character of important landscapes and be served by necessary infrastructure, but it is suggested that this should be overtly set out in the context that this will include the consideration of Green Belt and greenfield land in this context.</p> <p>As such, the locational principles should either be introduced in this context, i.e. inclusion of text to the effect that; "All locations for growth, whether Urban, Rural, Green Field, Green Belt or other will be subject to consideration of the following locational principles;" or, another principle should be added to reflect the identified situation in relation to Green Belt land, as set out in text, to the extent that; "Consider the development of Green Belt sites, particularly where they do not fulfil the role of their designation and/ or can deliver other benefits."</p>
Include files	
Number	Question 36
ID	LPIO4964
Full Name	Mr Michael Arrowsmith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I support the principles but these are not reflected in the plan. For example around Piccotts End where proposed development will destroy the local character of the hamlet as well as being in an area prone to flooding, a conservation area and an area of historical and archaeological significance.
Include files	
Number	Question 36
ID	LPIO5045
Full Name	Mr Chris Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Clause 10.2.3 states that "Protecting the character of our town (sic) and villages, and that of important landscapes and countryside will also be important considerations". In the case of Berkhamsted - in that it is a 'market town' that should be preserved as such - this should be an over-riding consideration.</p> <p>Other sections of this consultation suggest that to support the 5-year housing land supply, it would immediately be necessary to have 'Green Belt releases'. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity".</p>
Include files	
Number	Question 36
ID	LPIO5084
Full Name	mr Martin Silliton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Protecting Greenbelt is absolutely essential for peoples well being, wildlife, hedgerows and future generations. Protecting Greenbelt must be high priority.</p>
Include files	
Number	Question 36
ID	LPIO5130
Full Name	Mr John Wood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support the locational principles you mention in section 10.2 but your proposals would seem to go against this in terms of building on green belt land which would lead to 'urban sprawl'. Your proposals for the Kings Langley area also go completely against your principle of protecting the character and value of important landscapes, heritage and bio-diversity. In particular the suggested development for Wayside Farm in Kings Langley contradicts many of these principles.</p>
Include files	

Number	Question 36
ID	LPIO5147
Full Name	Miss michelle hilditch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	the local principles are sound but the local plan contradicts all of these except the 5 year housing needs of government,
Include files	
Number	Question 36
ID	LPIO5166
Full Name	Jameson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Development should be within urban capacity. The proposals for 5 year housing supply require release of greenbelt land, which is unacceptable.
Include files	
Number	Question 36
ID	LPIO5168
Full Name	Mrs Ruth Bareham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	To simply maximise the density of developments as a core principal does not seem to enable developments to provide gardens and outside space that would be in keeping with the villages and market town's existing properties. Additionally, the proposals around Kings Langley seem to meet very few of the above location principals particularly with regards to preventing urban sprawl, retaining character and providing (at best) questionable infrastructure solutions.
Include files	

Number	Question 36
ID	LPIO5225
Full Name	Mr Gareth Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But can they be met with more than 430/476 homes a year?
Include files	
Number	Question 36
ID	LPIO5283
Full Name	Mr Gary Ansell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	An additional location al principle should be included that focuses development on the three main towns and that Kings Langley is not considered as part of Hemel Hempstead due to its unique character as historic village.
Include files	
Number	Question 36
ID	LPIO5299
Full Name	Mrs Catherine Anderson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO5326
Full Name	Miss Giulietta Cinque
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposals do not locate development at sustainable locations, do not respect the character of existing settlements, do not make any attempt to restrict urban sprawl, do not protect the character and value of important landscapes, and have little regard to whether the necessary infrastructure is there to support the additional population.
Include files	
Number	Question 36
ID	LPIO5346
Full Name	Ilyn horne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Density of development needs to occur in more central locations to take advantage of existing infrastructure and public services. Extending already struggling locations such as market towns and villages does nothing more than place excessive strain on struggling infrastructures.
Include files	
Number	Question 36
ID	LPIO5375
Full Name	Dr Rachael Frost
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But proposals do not seem to reflect this
Include files	
Number	Question 36
ID	LPIO5407
Full Name	Mr Reuben Bellamy
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO5426
Full Name	Mr Padraig Dowd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Density of recent developments on top of already existing housing is simply too high and is simply a builder's approach to reducing cost. Also developments have not allowed for nor provided (a) central areas (parking, access, facilities, green areas, mixing of footprint and garden/lawns) and (b) are fitted right alongside other developments, amenities, green areas, etc. without any space to graduate between the two so with no aesthetics nor local character.</p> <p>Well-connected sustainable locations are not defined but based on your documentation, t often simply means already under-pressure towns and locations.</p> <p>You refer to 'restrict(ing) urban sprawl; however, there is little convincing evidence that you do that today. With builders currently driving many of these sites for development, it is difficult to see how you manage such an objective.</p> <p>Protect the character and value of important landscapes, heritage and biodiversity.</p> <p>Ensure that new development can be served by necessary infrastructure.</p> <p>Locate development to help support delivery of a 5 year housing land supply, as required by Government.</p>
Include files	
Number	Question 36
ID	LPIO5483
Full Name	Mr John Ingleby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO5507
Full Name	Mr Garrick Stevens
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Yes, but they cannot be achieved with these proposals.</p> <p>A Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. The 5-year housing land supply needs to be identified but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>B In a letter from the Department of Communities and Local Government, dated June 2016, the Minister of State for Housing and Planning, Brandon Lewis, states that</p> <p>“ . . . <i>Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people.</i>” He goes on to say: “<i>We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries</i>”.</p> <p>C Very dense developments are not appropriate for edge-of-town developments (See Local Transport Plan which seeks to reduce carbon emissions <i>inter alia</i>).</p>
Include files	
Number	Question 36
ID	LPIO5524
Full Name	Mr Robert May
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt should be preserved
Include files	
Number	Question 36

ID	LPIO5533
Full Name	Mrs Kristina Neville
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please add, no building on Green Belt. None of the sites in Kings Langley incl Shendish are therefore suitable.
Include files	
Number	Question 36
ID	LPIO5549
Full Name	Mr Bob Hattersley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	My concern is only with the qualification in point 2: "Maximise the density of development, whilst ensuring it reflects local character." As I commented earlier, local character should not be considered significant where a development is on the edge of a town. Especially since "local character" is generally interpreted by developers as "traditional" - a bland mish-mash of styles with no particular historical basis.
Include files	
Number	Question 36
ID	LPIO5658
Full Name	Mr Nigel Vanner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	1) Please reword the first principle - Maximise and use as a first priority brownfield sites for development 2) Please reword the seventh principle - Protect the character and value of important landscapes, biodiversity and Green Belt land designation
Include files	
Number	Question 36

ID	LPIO5699
Full Name	Mr Alastair Greene
Company / Organisation	Little Gaddesden Parish Council
Position	Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO5758
Full Name	Dr Lucy Murfett
Company / Organisation	Chilterns Conservation Board
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Chilterns Conservation Board considers that there is a crucial locational principle missing here: "Conserve and enhance the Chilterns AONB and its setting"
Include files	
Number	Question 36
ID	LPIO5820
Full Name	Mr Roy Farrant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	If by locating development at "well connected" locations you mean "close to major roads or railway stations", then the proposed development of Wayside Farm at Kings Langley seems logical. If you mean "easy for commuting and access to shops and facilities", you're having a laugh. Building near a major transport link serves to make life more difficult for all through higher local levels of congestion.
Include files	
Number	Question 36
ID	LPIO5905

Full Name	Mr Michael Lelieveld
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We support the response put forward by Berkhamsted Town Council for this question (being Yes, but...).
Include files	
Number	Question 36
ID	LPIO5937
Full Name	Mr Grahame Partridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity".
Include files	
Number	Question 36
ID	LPIO6004
Full Name	Mr Paul Craig
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO6112
Full Name	Mr Andrew Jones
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The areas located are not suitable for this level of development. it will double the population of a small village.
Include files	
Number	Question 36
ID	LPIO6128
Full Name	Steve Pitts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Those principles are all well and good but the final one conflicts with almost all of the others and some or all of those principles will need to be compromised in order to meet the Government's targets.
Include files	
Number	Question 36
ID	LPIO6144
Full Name	Mrs Rosemary North
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO6219
Full Name	Mr Colin Tate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	<p>Para 10.2.2 says "National planning policy is also clear that Green Belt boundaries should only be changed in exceptional circumstances. The protection of the Green Belt from inappropriate development is an important national and local principle. Current evidence suggests that the Green Belt within Dacorum is largely fulfilling the role for which it was designated, however there are some areas that have been identified as not fully meeting all the Government's criteria for designation".</p> <p>I appreciate that Dacorum's Locational Principles in its Local Plan cannot repeat National planning policy.</p> <p>But no details are given of the areas that have been identified as not fully meeting all the criteria for Green Belt designation, nor is any justification given for this statement.</p> <p>Is it suggested that the Green Belt on the outskirts of Kings Langley at Shendish, Hill Farm, Wayside Farm and Rectory Farm fails to meet the criteria for designation as Green Belt?</p> <p>If so, which of the criteria have not been satisfied?</p>
Include files	
Number	Question 36
ID	LPIO6275
Full Name	dr kim goode
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO6367
Full Name	Miss Lucy Muzio
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do not agree with any!
Include files	
Number	Question 36
ID	LPIO6444
Full Name	Mr andrew miller

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Locations should be identified for a real need and not concentrated in to a small area (e.g, Kings Langley)
Include files	
Number	Question 36
ID	LPIO6454
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is nothing about specifically protecting the green belt.
Include files	
Number	Question 36
ID	LPIO6501
Full Name	Mr Topan Dutta
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The principle seems reasonable
Include files	
Number	Question 36
ID	LPIO6519
Full Name	Mrs anna silsby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	The Locational Principles do not make any reference to Greenbelt land and its special character. Not using Greenbelt land should be the very top priority as other follow from the principle (such as restrict urban sprawl).
Include files	
Number	Question 36
ID	LPIO6632
Full Name	Mrs Victoria Janaway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I do not agree with:</p> <ul style="list-style-type: none"> • Maximise the use of brownfield land for development - I see no evidence of this • Maximise the density of development, whilst ensuring it reflects local character - No, density should not be maximised, character, community and education, welfare and health provision should be prioritised • Support urban regeneration – particularly of Hemel Hempstead new town, only if there are sufficient changes to the infrastructure and provisions for the community and greenbelt is not built on to accomodate housing of those supposed new employment opportunities • Locate development at well-connected sustainable locations - no, well-connected is not correct, the locations should prevent building on greenbelt and preserve communities - the area is already over-populated and the infrastructure already cannot cope. • Avoid areas at high risk of flooding - if this means building on greenbelt instead, no. • Ensure that new development can be served by necessary infrastructure - before the houses are built, and provisions are not promised and yet not delivered as happened in Leavesden, the provision of a school was not followed through and the 'playground' is a shambles, glass in the sandpits and the grounds are frankly lethal, without the right safety provisions in place, and no parking considerations .

	<ul style="list-style-type: none"> Locate development to help support delivery of a 5 year housing land supply, as required by Government. ABSOLUTELY NOT. Build on brownfield sites, leave the greenbelt alone. Show evidence of why we need these houses.
Include files	
Number	Question 36
ID	LPIO6644
Full Name	Ms C Oxer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	"Maximise the density" - so many people complain that new housing estates are squashed together with gardens that are too small and have little privacy. We ought to be 'encouraging' developers to provide <u>bigger</u> gardens, with more space for children to play outdoors in safety.
Include files	
Number	Question 36
ID	LPIO6717
Full Name	Mr Nick Hollinghurst
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO6727
Full Name	Mr Alan Horn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The area Be-h4 Durrants Lane/ Bell Lane/Darr's Lane will not meet the Locational Principle "Locate development at well-connected sustainable locations". Since the introduction of traffic lights at the Durrants

	Lane/A4251 and Kings Road/Kingshill Way/Shootersway junctions the amount of traffic using Durrants Lane, and Darrs Lane, has drastically increased to a level that would not take an additional volume from this proposed development. Especially given the steep slopes. The location, and the likely low proportion of social rent homes the developer would negotiate, would mean that virtually all journeys would be by car. Any bus service that the developer suggests could meet the transport objectives would not be sufficiently supported to make it viable.
Include files	
Number	Question 36
ID	LPIO6749
Full Name	Mr Geoff Latham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In principle but there could be a difference of interpretation of say urban sprawl - is it a straggle, or would it also include any expansion of settlements by say infill or consolidation?
Include files	
Number	Question 36
ID	LPIO6758
Full Name	Mr Andrew Lambourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Broadly yes, whilst ensuring that the character of small villages is protected, focusing development where infrastructure exists, but resisting unreasonable development demands or developer-led proposals which run counter to protecting green belt whilst brown field development or even redevelopment (at higher density) options can be found.
Include files	
Number	Question 36
ID	LPIO6835
Full Name	Mr Nicholas Ring
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Add - Do not allow development on greenfield sites.
Include files	
Number	Question 36
ID	LPIO6887
Full Name	Helen Cole
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I dont agree with maximising density for market towns such as tring and Berkhamsted. This leads to poor quality of life, parking issues and congestion. People don't choose to live in a market town to be in a high density environment. That is why they choose to commute rather than live in London. Maybe this is more suited to larger towns and cities.
Include files	
Number	Question 36
ID	LPIO6928
Full Name	Bradford Gunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO6977
Full Name	Mr Robert Mostyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The overall principle behind any planning should be whether it conforms the greenhouse gas reduction targets. If we don't conform to the targets there may not be a Dacorum Borough Council in 200 years time. A bit dramatic? Maybe. But maybe not.</p> <p>The government is advocating economic growth as the driving force but is this a wise strategy for the UK? If it isn't, then it needs to be challenged and it ought to be challenged by the local authorities just as much as from citizens. The mantra of growth has been the basis of economic theory since the late 1700's but this theory became bankrupt when we began to generate more greenhouse gases than the earth could absorb. This occurred around 1970. That boundary changes EVERYTHING we have come to know about economic theory.</p> <p>Is the UK environmentally sustainable? Are we producing enough food to be resilient? It may make more strategic sense to plan for a reduction in numbers in order to achieve our Paris Agreement reduction targets.</p>
Include files	
Number	Question 36
ID	LPIO7028
Full Name	mr michael hicks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	policy cs1 covers this already in a more clear manner
Include files	
Number	Question 36
ID	LPIO7063
Full Name	Mrs Gillian Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q. 36 to 45 No</p> <p>It seems that Berkhamsted has contributed housing for the current Core Strategy over and above the required amount and that other areas have not developed at the same rate. This does not seem to have been taken into account in preparing this consultation. <u>Berkhamsted</u> feels as if it is <u>bursting</u> with all the development currently</p>

	<p>underway and planned. The schools are pretty full, the Doctors are overworked, air pollution exceeds EU regulations, traffic at rush hours is dreadful, playing fields and playgrounds are very busy.</p> <p>Of all the options put forward the only one I feel would be acceptable is Option 1B.</p>
Include files	
Number	Question 36
ID	LPIO7126
Full Name	Mr & Mrs Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for</p>

in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG RESPONSE TO Q36 - FULL DOC ATTACHED TO Q46

Question 36

Do you support the proposed locational principles?

No

Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates

that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO7337
Full Name	Brian and Heidi Norris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We fully understand the need for additional housing in this country, but it should not be to the detriment of towns

	<p>such as ours. We do not intend to reply to the 46 questions one by one, but support the answers given by the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group and support Option 1B in the Strategy Plan. Even this number of 600 further homes is, in our view, more than enough, but we understand that is an existing commitment.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36</p> <p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"</p>
Include files	
Number	Question 36
ID	LPIO7394
Full Name	Mr Francis Watson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Even in the 1500's there was a "green belt" around London to protect the status quo. In modern times the "Green Belt" was invented in the mid 1900's. The main thinking behind this idea was to prevent further urban sprawl and to improve or retain the conditions existing for wildlife. In this respect, nothing has changed.</p> <p>It is accepted that there is a shortage of housing in this country which needs to be addressed. Building on green field sites is not the answer. It has been proved that many urban areas have sufficient brown field sites that can be utilised for additional building without impacting on the countryside we have around the area. Once houses (or indeed industrial buildings) have been erected on Green Belt sites, the land can never be reclaimed and will be lost for ever for future generations. It has also been proved that large developers have been sitting on substantial land banks until they consider a time when</p>

	<p>they can make most profit (most of these are in urban areas).</p> <p>I understand that Dacorum Borough Council have estimated that they can provide the number of houses that the Government has determined and these can be built on existing and planned areas. However, DBC are looking at Green Belt sites if the current projections substantially increase.</p>
Include files	
Number	Question 36
ID	LPIO7405
Full Name	Mr Clive Birch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"</p>
Include files	
Number	Question 36
ID	LPIO7682
Full Name	JUNE LIGHTFOOT
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Questions 36 to 39</p> <p>No – see Question 40</p> <p>Question 40 Is Option 1B your preferred option for delivering the growth needs of the Borough?</p> <p>Yes.</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p>

Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.

Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more options for growth distribution.

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.

Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town's historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

Central Government's policy on Green Belt is clear: “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning, June 2016), and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 36

ID	LPIO7923
Full Name	Dr Peter Chapman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO7962
Full Name	Mr Norman Groves
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to confirm that I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG RESPONSE TO Q36</p> <p>Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require</p> <p>Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates</p> <p>that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"</p>
Include files	
Number	Question 36
ID	LPIO8011
Full Name	Mr Michael Nidd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	however.....

	One of the most important locational principles is missing altogether. 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. Some sections of this consultation suggest that to show that the plan incorporated provision of a 5 year housing land supply would require immediate Green Belt releases. This is merely asserted, not proven.
Include files	
Number	Question 36
ID	LP108386
Full Name	Mrs Sarah Rees
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical</p>

exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO8429
Full Name	Spencer Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

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

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would

	immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO8461
Full Name	Mr Peter Shell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Because of the above I am not in a position to myself provide detailed answers to all the questions, but have seen the response prepared by BRAG and agree with their comments which should also be regarded as my own.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO8483
Full Name	Mrs Pat Berkley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG's responses under my/our name.</p>

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

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

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

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	immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO8501
Full Name	Mr Lawrence Sutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for</p>

	<p>in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO8582
Full Name	Helen & Stuart Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action group have responded in full to the issues and options consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation the we wish DBC to duplicate BRAG's responses under our name.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p>

	<ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO8679
Full Name	MRS G RUSSELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No</p> <p>1- Because again they are completely at odds with the proposed Local Plan and do not exclude the Green Belt from development.</p> <p>2- The first locational principle should be that development in the Green Belt would only be considered in “exceptional circumstances” and there are no exceptional circumstances.</p>
Include files	
Number	Question 36
ID	LPIO8711
Full Name	MR NIGEL EGERTON-KING
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	High density residential developments are not appropriate in our historical market town
Include files	
Number	Question 36
ID	LPIO8775
Full Name	gregory lee
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Selecting green belt land (or re-categorising the green belt) is not a location principle that I support. Re-purposing existing non-green belt meets housing needs and generates economic growth without impacting the quality of life that could be enjoyed by all.
Include files	
Number	Question 36
ID	LPIO8963
Full Name	barney greenwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No – see Question 40 q40</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be</p>

	<p>recognized when considering housing allocations between them.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>Central Government's policy on Green Belt is clear: "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning, June 2016), and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes</p>
Include files	
Number	Question 36
ID	LPIO9043
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO9056
Full Name	David Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	No
Include files	
Number	Question 36
ID	LPIO9168
Full Name	S Langley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt</p>

	boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.
Include files	
Number	Question 36
ID	LPIO9781
Full Name	Aly MacLean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report,</p>

	<p>development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, <u>Option 1B</u> is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO9829
Full Name	Mr Paul Wardle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p>

	<p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10004
Full Name	mr Kevin Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing</p>

distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

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Include files	
Number	Question 36
ID	LPIO10052
Full Name	Jill Mewha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.

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	headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10121
Full Name	Melanie Frankel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report,</p>

	<p>development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO10169
Full Name	Natalie Crane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation</p>

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

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

Include files	
Number	Question 36

ID	LPIO10226
Full Name	Mr Tim Beeby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change</p>

	<p>Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO10273
Full Name	John and Jane Beeley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline</p>

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

BRAG response to Question 36 (please note full document is attached to Q46)

	<p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10323
Full Name	Kathleen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing in response to the latest plan for housing development in Berkhamsted, most of which suggests an excessive and impractical number of new houses. I have read your Local Plan 2017 and I have read the reply of Berkhamsted Residents' Action Group (BRAG) and agree that <u>Option 1B is the only option acceptable</u>. I agree entirely with the BRAG response to your plan.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10372
Full Name	J&P Savage
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Secondly, the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>

	<p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10437
Full Name	Mr Daniel Parry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different</p>

topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO10486
Full Name	David Burbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, <u>I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</u>

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

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

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

	<ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10536
Full Name	Mr Stephen Doughty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>I would however like to make a few specific comments.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10584
Full Name	Mr Roger Petts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation.

	<p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10631
Full Name	Simon Chilton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account</p>

when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 36 please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO10681
Full Name	Sally and David Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please register as support for BRAG's submission. BRAG response to Question 36 (please note full document is attached to Q46) Question 36 <i>Do you support the proposed locational principles?</i>

	<ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO10729
Full Name	Mrs Jenny Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Five year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC has carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted has <u>exceeded by 34%</u>. All this without any improvements</p>

in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognised when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be very detrimental, given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high seems to be a function of demand from the developers who generate the highest

	<p>profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10763
Full Name	Taylor Wimpy Strategic Land
Company / Organisation	Taylor Wimpy Strategic Land
Position	C/O Pegasus Group
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The locational principles are generally supported. in particular, the recognition of the need to locate development in well-connected and sustainable locations (as required under paragraph 84 of the Framework). However, the principles do not currently recognise the potential of locations such as larger villages in the rural area to contribute towards sustainable development. This should be included as one of the locational principles to ensure that all parts of Dacorum play a role in achieving sustainable development.</p> <p>For full response please see question 46.</p>
Include files	
Number	Question 36
ID	LPIO10823
Full Name	Grant Imlah
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Moreover i am aware that The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted</p>

	<p>and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO10875
Full Name	Sheila Dawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have studied the above plan, accessed the BRAG website, and attended the Berkhamsted Citizens Association Visioning Evening on 15 November and the Berkhamsted Town Council presentation on 22 November.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current</p>

Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO10923
Full Name	Jean Thomas
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Hemel Hempstead developments are 21% below the target figure. This shortfall should be taken into account in the new plans when assessing development numbers and site options.</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p>
Include files	
Number	Question 36
ID	LP1010973
Full Name	Christopher Stafford
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand</p>

	<p>from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO11023
Full Name	Mrs Patti Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure.</p>

All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Do you support the proposed locational principles?

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

Include files	
Number	Question 36
ID	LPIO11070
Full Name	J M Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Hemel Hempstead developments are 21% below the target figure. This shortfall should be taken into account in the new plans when assessing development numbers and site options.</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p>
Include files	
Number	Question 36
ID	LPIO11102
Full Name	Denis Maclure
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>see [preferred option] Question 40 (below)</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>Central Government’s policy on Green Belt is clear: “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning, June 2016), and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high</p>

	is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 36
ID	LPIO11150
Full Name	Cally Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO11197
Full Name	Mr Neil Aitchison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The majority of new commitments should go to Hemel Hempstead.
Include files	
Number	Question 36
ID	LPIO11245
Full Name	Jon Rollit
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent</p>

	<p>budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO11294
Full Name	Kate Locke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In addition I would reiterate the extensive points made in the BRAG response to the ‘Issues & Options’ consultation. I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. The Berkhamsted Residents Action Group (BRAG) has responded in full.</p> <p>In addition, I like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a</p>

rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO11383
Full Name	Ms Lorraine Gilmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>BRAG has responded in full to the 'Issues & Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish Dacorum Borough Council (DBC) to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasise some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing</p>

	<p>alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO11433
Full Name	Conian
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land</p>

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

BRAG response to Question 36 (please note full document is attached to Q46)

Do you support the proposed locational principles?

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

Include files	
Number	Question 36
ID	LPIO11493
Full Name	Mr Alan Ledger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	High density residential developments are not appropriate in our historical market town
Include files	
Number	Question 36
ID	LPIO11539
Full Name	Ms Eliza Hermann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The most important and first Locational Principle should be a clear statement that the Chilterns Area of Outstanding Natural Beauty and the Green Belt will be protected from development. Currently this is missing from the list of proposed Locational Principles.</p> <p>The consultation document proposes a Locational Principle of "Maximise the use of brownfield land for development" and I agree with this, but it is undermined by the focus of these consultation documents on greenfield development on land currently in the Green Belt and Chilterns AONB. The Local Plan needs to focus on and emphasise the ongoing identification and redevelopment / regeneration of brownfield sites throughout the entire borough.</p>
Include files	
Number	Question 36
ID	LPIO11621
Full Name	Janet and James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted</p>

	<p>and under Government policy cannot lead to Green Belt boundary changes.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO11775
Full Name	Edmund Hobley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy, Berkhamsted has exceeded targets for the rate of development by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan</p>

comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Brag Response to question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO11815
Full Name	John Thomson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But many principles do not apply to Shendish

Include files	
Number	Question 36
ID	LPIO11925
Full Name	Janet Mason
Company / Organisation	Berkhamsted Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. The 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity".</p> <p>Very dense developments are not appropriate for edge-of-town developments (see LTP which seeks to reduce carbon emissions <i>inter alia</i>).</p>
Include files	
Number	Question 36
ID	LPIO11971
Full Name	Dee Sells
Company / Organisation	Markyate Parish Council
Position	Parish Clerk/ RFO
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Markyate Parish Council has made its comments earlier in the consultation. We do not believe that any new housing should be considered until the water supply issue is resolved. We do not believe Markyate is appropriate for any further building save to meet local needs.</p>
Include files	
Number	Question 36
ID	LPIO12073
Full Name	David Wilyman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>

	<p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted</p> <p>Standard BRAG response to Question 36. Please note full document is attached to Question 46</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12110
Full Name	Colin Blundel
Company / Organisation	Chiltern Society
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>The locational principles should also refer to conserving and enhancing the Chilterns AONB and protecting the openness and permanence of the Green Belt.</p>
Include files	
Number	Question 36
ID	LPIO12168
Full Name	Ray Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-

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

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

	<p>Standard BRAG response to Question 36. Please note full document is attached to Q46.</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LP1012228
Full Name	Douglas & Christina Billington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical</p>

	<p>exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO12307
Full Name	Richard Frankel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first

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2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

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Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously

	5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12374
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes, on balance. (Locational principle has potential for controversy, but on balance is preferable to urban sprawl, provided there is generous provision of open space/play areas.)
Include files	
Number	Question 36
ID	LPIO12398
Full Name	ms rona morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	5 year land supply should exclude Green Belt and Berkhamsted should get relief for being well ahead of its planned build rate.
Include files	
Number	Question 36
ID	LPIO12451
Full Name	Judy Halden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in

the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

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	<p>Standard BRAG response to Question 36. Please note full document is attached to Question 46.</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LP1012499
Full Name	Meenakshi Jefferys
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure</p>

	<p>constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12546
Full Name	Mrs Jane Barrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

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

Standard BRAG response for Question 36. Please note full document is attached to Question 46.

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would

	immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12596
Full Name	mr paul healy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for</p>

	<p>in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO12646
Full Name	Merrick Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasise just a few of the most important points within that response.</p>

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

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC

	have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO12694
Full Name	Monika & Casper Gibilaro
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under our name</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does</p>

	<p>not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12742
Full Name	Lorna Ginn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline</p>

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

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would

	immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12791
Full Name	Mr Raymond Phipps
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12838
Full Name	Ingrid Carola McKenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p>

In addition, I draw attention to some of the most important points within that response.

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

The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. Beyond short term financial profit developers have no interest in the wellbeing of the town, the local council and its residents. Once having built and taken their profit developers leave the residents and local council to deal with the fallout.

	<p>Such demand from developers is Absolutely the Wrong reason to focus even more development on Berkhamsted.</p> <p>Further, under Government policy it cannot lead to Green Belt boundary changes.</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12886
Full Name	Mr Stephen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO12940

Full Name	Jon Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated</p>

	<p>many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO12989
Full Name	Edward Keane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10</p>

years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO13038
Full Name	Bettina Deuse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy, Berkhamsted has exceeded targets for the rate of development by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>

	<p>BRAG response to question 36 below (full BRAG response see question 46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO13091
Full Name	Mr Paul Tinworth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO13139
Full Name	Hilary Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-

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

BRAG response to Question 36 (please note full document is attached to Q46)

	<p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO13197
Full Name	Mr J G Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	'Maximise the density of development'. This has clearly happened at Nash Mills, Ovaltine and Apsley with no new road infrastructure thus allowing Kings Langley to grind to a halt in the mornings and evenings whilst everyone cuts through to get to the A41, M25 and Watford.
Include files	
Number	Question 36
ID	LPIO13267
Full Name	D. Phillips
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully concur with the comments attached from BRAG. The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p>

Question 36 Do you support the proposed locational principles?

No

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

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	1B is the only one that would be acceptable for Berkhamsted.
Include files	
Number	Question 36
ID	LPIO13418
Full Name	Mr Alan Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I agree in principle but would suggest that your proposals of Kings Langley go against them
Include files	
Number	Question 36
ID	LPIO13419
Full Name	Mrs Christine Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I agree in principle but would suggest that your proposals of Kings Langley go against them
Include files	
Number	Question 36
ID	LPIO13473
Full Name	Mrs Catherine Imber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

	<p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p><i>We agree the principles and expect to see them rigorously applied.</i></p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LP1013521
Full Name	Deborah Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel</p>

developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO13576
Full Name	Mr Alan O'Neill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.</p> <p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted.</p> <p>Of the options put forward, <u>Option 1B is the only one that would be acceptable for Berkhamsted.</u></p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO13629
Full Name	Sue O'Neill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

<p>Your response - Please add your response here</p>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.</p> <p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted.</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
<p>Include files</p>	
<p>Number</p>	<p>Question 36</p>
<p>ID</p>	<p>LPIO13691</p>
<p>Full Name</p>	<p>Tim Uden</p>
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Agent Name</p>	
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Your Opinion - Please state your opinion here</p>	<p>No</p>

Your response - Please add your response here

The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under my name.

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

Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt

	<p>boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO13756
Full Name	Edward Hatley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that, to support the 5 year housing land supply, will require Green Belt releases immediately. Obviously, a 5 year housing land supply needs to be properly identified but the consultation document indicates that DBC have ill-conceived ideas of how to do this.</p> <p>The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.</p> <p>There are many more permutations for growth distribution, but DBC appear to have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy, Berkhamsted has exceeded the target by a massive 34% without any improvements in infrastructure. The problems with parking (which the proposed ill-conceived</p>

multi-storey car park will not solve), insufficient medical facilities and the impact on our schools are just a few of the areas that need addressing.

In contrast, Hemel has developed at a rate some 21% **below** the target figure. The entire shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options.

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs that should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful.

Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. The Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting". The excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.

The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO13807

Full Name	Mr Roger Didham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to</p>

	<p>Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO13862
Full Name	Alex Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive</p>

34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

Include files	
Number	Question 36
ID	LPIO13893
Full Name	Mr John James
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In para 10.2.4 'Locational principles are listed (1 to 9). I support 1 (probably none in Kings Langley, 3, 5, 6, 7, 8 and 9 (in appropriate locations).
Include files	
Number	Question 36
ID	LPIO14031
Full Name	Danny Jennings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum's Local Plan.</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO14080
Full Name	Mr John Goffey
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response to the DBC <i>Issues and Options</i> document. We would, in addition, like to add the following points concerning Question 33 of the above document.</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO14128
Full Name	Sue Elleray
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline</p>

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

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

Include files

Number	Question 36
ID	LPIO14179
Full Name	Mr Richard White
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO14324
Full Name	Ms Vicky Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as do confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another</p>

Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36

ID	LPIO14362
Full Name	Mr Humphreys
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Expand towns - not villages
Include files	
Number	Question 36
ID	LPIO14408
Full Name	Ray Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel</p>

	<p>Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear –“demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning –June2016)–and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO14457
Full Name	Giselle Okin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To

	<p>avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO14506
Full Name	Mr David Griffin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</i></p> <p><i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i></p> <p><i>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick</i></p>

up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 Do you support the proposed locational principles?

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

Include files	
Number	Question 36
ID	LPIO14783
Full Name	Ms Paula Farnham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues & Options' consultation. I could make similar comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity to emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt</p>

	<p>boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO14815
Full Name	Steve Baker
Company / Organisation	CPRE - The Hertfordshire Society
Position	Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.’
Include files	
Number	Question 36
ID	LPIO14855
Full Name	Bev Mckenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’

consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

In addition, I draw attention to some of the most important points within that response

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

protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.

The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted.

Beyond short term financial profit developers have no interest in the wellbeing of the town, the local council and its residents.

Once having built and taken their profit developers leave the residents and local council to deal with the fallout.

Such demand from developers is Absolutely the Wrong reason to focus even more development on Berkhamsted.

Further, under Government policy it cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO14901
Full Name	Mr Michael Curry
Company / Organisation	Tring Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	This is effectively a duplication of Policy CS1 Distribution of Development. There should be clarity on the precedence of Policy CS1 over the Location Principles.
Include files	
Number	Question 36
ID	LPIO14958
Full Name	Malcolm and Jill Allen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report,</p>

	<p>development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO15008
Full Name	Mr Clive Freestone
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require</p>

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

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC

	have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO15056
Full Name	Mr & Mrs D A Simmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. We request you accept this summary as confirmation that we wish DBC to duplicate BRAG’s responses under our names.</p> <p>We would like to take this opportunity to emphasize a few of the most important points within that response, <i>in particular our response to Q25.</i></p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced</p>

	<p>against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO15081
Full Name	Tom Simmons
Company / Organisation	St William Homes LLP
Position	Development Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>St William support measures which DBC have taken in an attempt to maximum their housing capacity including:</p> <p><i>Allowing housing on land which is no longer needed for employment uses; and</i></p> <ol style="list-style-type: none"> <i>Encouraging higher densities and taller buildings on sites where this won't be damaging to the area's character i.e. Hemel Hempstead Town Centre and parts of the Two Waters and Apsley area.</i> <p>It is however considered that by adopting a more ambitious approach to optimising brownfield sites, including increasing densities in the Two Waters and Apsley area further, DBC could bring their maximum housing capacity (10,940) closer to the locally assessed housing need (17,388).</p>

Include files	
Number	Question 36
ID	LPIO15105
Full Name	Grand Union Investments
Company / Organisation	Grand Union Investments C/O Savills
Position	Associate Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> As stated above in relation to Issue 1, significant weight should be placed upon sustainability as a guiding principle to determine which locations will be a focus for growth. Sustainability is a 'golden thread' at the heart of the NPPF, and in accordance with this, growth should be directed to those locations where services and infrastructure is already established and can be built upon to ensure healthy and sustainable lifestyles. Central to the principle of sustainable development is that reliance upon the private car is minimised, and that communities are able to go about their day-to-day lives through sustainable forms of movement, such as walking, cycling and public transport. In terms of the local situation in Dacorum, 2011 Census data available via the Herts Insight website shows that Berkhamsted already experiences the lowest level of journeying to work by car when compared to the other main settlements in Dacorum. Specifically, 37.75% of working people in Berkhamsted drive to work by car or van, as opposed to 46.35% of people in Hemel Hempstead and 44.69% of people in Tring. This is reflected in the 2011 Census data for travel to work by public 16.21% of the working population in Berkhamsted travels to work by public transport, whilst this level is much lower in Hemel Hempstead and Tring, where 7.17% and 8.51% of the working populations respectively travel to work using public transport modes. Consequently, there is a particular opportunity to build upon these sustainable patterns of travel evident in Berkamstead by focussing growth on the town.
Include files	
Number	Question 36
ID	LPIO15135
Full Name	Simon Foster Monique Bos
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We refer to these in our response to question 45 in relation to the site at Dunsley Farm in Tring (Site Reference TR-H5), which does not comply with these principles.</p> <p>Copy Q46 answer</p> <p>For the reasons set out in this Statement, we do not consider that it would be appropriate to allocate land at Dunsley Farm in Tring (Site Reference TR-H5) in the emerging Local Plan. In summary, the land should not be allocated for the following reasons.</p> <p>Wiggington, Aldbury, Cow Roast, Chipperfield, and Flamstead, as they also have a need for new homes that should be addressed. The Council should also seek to deliver any new housing growth through the release of smaller sites rather than a limited number of very large allocations.</p> <p>The site at Dunsley Farm in Tring is in a sensitive location and subject to a number of designations, which indicate that the land is not suitable for the scale of development proposed, including the following:-</p> <ul style="list-style-type: none"> • Is in the Green Belt where there is a presumption against <i>'inappropriate development'</i>. Industrial/warehouse development and housing are defined as inappropriate development and should not be permitted unless 'very special circumstances' • Is in an area of acknowledged 'Landscape Sensitivity'. The site is directly adjacent to the Chilterns Area of Outstanding Natural Beauty and would result in harm to a protected and valued landscape, which is contrary to Paragraph 11 of the National Planning Policy Framework. Paragraph 115 of the National Planning Policy Framework states that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. • The development of the Dunsley Farm site would harm the <i>"intrinsic character and beauty of the Countryside"</i>, which is contrary to paragraph 17 of the National Planning Policy Framework. • The site is adjacent to Pendley Manor which is a Listed Building and has a Locally Registered Park and The development of the site would affect the setting of these heritage assets and this is unacceptable having regard to Section 12 of the National Planning Policy Framework which relates to the conservation of the historic environment. • Contains a Local Wildlife Site and no details are provided as to how this would be mitigated from the proposed development. The Sustainability Appraisal also states that in respect of biodiversity, the allocation would result in the loss of natural habitats. The development of the site is not considered to be acceptable having regard to

section 11 of the National Planning Policy Framework, which relates to the conservation of the natural environment.

The consultation document sets out a number of suggested principles that should be used when choosing new growth locations. However, the proposed site at Dunsley Farm in Tring does not comply with these locational principles. We conclude, therefore, that it is not an appropriate location for growth, as set out in the table below.

Locational Principles

Assessment in relation to proposed allocation at Dunsley Farm in Tring

Does proposed allocation comply with Locational Principle?

Maximise the use of brownfield land for development

The site comprises of greenfield (not previously developed) land

No

Support urban regeneration – particularly of Hemel Hempstead new town

The provision of housing and employment on this rural site will direct growth away from the settlement of Hemel Hempstead and will make it harder to regenerate the town

No

Locate development at well-connected sustainable locations

There are much more accessible locations in the Borough. The site is not within walking distance of Tring Station

No

Avoid areas at high risk of flooding

The site is in a low flood zone

Yes

Respect the character of the existing settlement pattern and restrict urban sprawl

The allocation of such a large site on the edge of the existing built up area of Tring, including 5 hectares of industrial and warehouse development, will result in urban sprawl into the countryside and will not respect the local character of the settlement.

No

Protect the character and value of important landscapes, heritage and biodiversity

	<p>The development would result in harm to many important designations</p> <p>No</p> <p>Ensure that new development can be served by necessary infrastructure</p> <p>Existing infrastructure (schools and healthcare) is already at capacity and no new infrastructure is proposed</p> <p>No</p> <p>Finally, the site is not a suitable location for industrial and warehouse development. The only other locations being proposed by the Council for such development are at Two Waters in Hemel Hempstead and at Maylands Gateway. These are locations where one would expect industrial development to be located, they are very different in character to land at Dunsley Farm in Tring. The provision of industrial and warehouse development at Dunsley Farm would harm the natural beauty and rural nature of the land.</p>
Include files	
Number	Question 36
ID	LPIO15285
Full Name	Caroline Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36: <i>Do you support the proposed locational principles?</i></p>

	<p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO15335
Full Name	Mr Alan Conway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues & Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q33 to Q45 I support the BRAG submission. Yet again the failure to provide an accurate base from which to proceed renders much of what follows suspect and in many parts misleading.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO15384
Full Name	Sue Wolstenholme
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p>Standard BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO15406
Full Name	Paul de Hoest
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1 Due to all the above it is critical to meet the new build projections contained in the current plan, let alone any of the options contained in this consultation, that town-wide planning needs to take full account of the supporting infrastructure required. We believe that measures should be taken to encourage the development of local jobs in local economies and reverse the trend towards additional London commuting. Simply building more properties for London-workers to commute from will, apart from adding to an already overcrowded commuter rail service, do little to develop the fabric of local community</p>
Include files	
Number	Question 36
ID	LPIO15446
Full Name	Nick Hanling
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this.</p> <p>The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise.</p> <p>Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even</p>

	<p>more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p> <p>Of the options put forward, <u>Option 1B</u> is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO15494
Full Name	Sarah and Nigel Tester
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill- conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in</p>

infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

No

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO15551
Full Name	Miss Tanya Assarat
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO15600
Full Name	Melanie Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	

Number	Question 36
ID	LPIO15666
Full Name	Mr James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO15725
Full Name	Mark Pawlett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p>

	It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward
Include files	
Number	Question 36
ID	LPIO15773
Full Name	Maria & Colin Sturges
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO15820
Full Name	David Kerrigan
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p>No – see Question 40</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO15878
Full Name	D B Land and Planning
Company / Organisation	D B Land and Planning
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • DBLP to not support the proposed locational principles for the following reasons: • The drive to maximise the use of brownfield land for development is not a realistic solution, given the lack of availability of brownfield land in the borough. In addition, has the Plan given sufficient consideration to the loss of brownfield land opportunities, currently in employment use and their loss to residential will have to be compensated for elsewhere • Maximising densities, there is clear guidance in the Framework (para 47) that development densities have to reflect a site’s context and any simple push to maximise such densities could compromise wider design objectives. In allocating sites, DBLP advocate a process of dialogue between the Council and developers to ensure

	<p>that assumptions about number of units and development density is realistic.</p> <ul style="list-style-type: none"> • There is a need to provide a clear statement that the locational principles will see proportionate levels of growth taking place at second tier locations in the Borough. Currently, the principles are silent about explicitly directing development to other locations outside of Hemel Hempstead. This omission has to be addressed to provide clear guidance for the policies being designed to support this objective
Include files	
Number	Question 36
ID	LPIO15926
Full Name	James Pitt
Company / Organisation	Gleeson Developments Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Whilst we do not disagree with any of the particular locational considerations listed under Issue 26, we query as to whether or not the list is fully comprehensive. In particular, we note that there is a discrepancy between the list of locational factors identified in the Issues and Options Draft under Issue 26, and the list of criteria used in the Sustainability Appraisal for site assessment. The latter includes, for example, impacts on biodiversity and impact on soils, which are also relevant locational considerations, not referred to the Issues and Options Draft.</p> <p>Avoidance of development in locations of high biodiversity value would normally be a standard locational requirement. In respect of soils, the NPPF makes clear that land of higher agricultural value should be avoided, and preference should be given to land of poorer quality (NPPF para 112).</p>
Include files	
Number	Question 36
ID	LPIO15987
Full Name	Mr Robert Sellwood
Company / Organisation	The Crown Estate
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	These principles are all supported as broad statements, however it is considered that the first principle relating to the use of brownfield land could be refined. The concern is that not all brownfield land is located in suitable and sustainable locations and it would not be an appropriate strategy to select either unsuitable or unsustainable locations just because they happen to be brownfield in character.
Include files	
Number	Question 36
ID	LPIO16077
Full Name	Dave Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO16132
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and

	<p>the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO16191
Full Name	Stuart Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO16248
Full Name	Stuart Mears
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</p> <p>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO16309
Full Name	Kitty Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>please find the attached report written on mine and other residents request.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	

Number	Question 36
ID	LPIO16371
Full Name	Aaron Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support GFRA responses see below.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO16419
Full Name	Ruth and Stephen Wright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have</p>

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

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

No

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

Include files	
Number	Question 36
ID	LPIO16484
Full Name	Andrew Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO16560
Full Name	Ian Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <p>. Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have</p>

	ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO16695
Full Name	Katie Parsons
Company / Organisation	Historic England
Position	Historic Environment Planning Advisor
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We do not have a preference for any growth option at present until further information and analysis has been carried with regards to potential heritage impacts. However, we are keen to ensure that growth and development conserves and enhances the significance of the Borough’s many heritage assets.</p> <p>We are pleased to see that the cumulative impacts deriving from the potential development at Gorhambury in the neighbouring authority of St Albans City and District is being considered as part of the growth options appraisal process. A good understanding of the cumulative impacts of development is an important part of understanding the wider impacts upon the historic environment.</p>
Include files	
Number	Question 36
ID	LPIO16749
Full Name	Martin Ephgrave
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We would like to comment on two of the Locational Principles, and suggest revised wording, as follows:</p> <p>The third bullet point states that the Council will “<i>Locate development at well-connected sustainable locations</i>”. We do not consider that new development should <u>only</u> be located at the most sustainable locations in the Borough, as to do so would prevent much needed new development in smaller settlements. Smaller settlements in the ‘Rest of the Borough’ are inevitably less sustainable than sites in the larger towns, but they still have a need for new homes, so should not be deprived</p>

	<p>of growth. It is considered that the council should allocate sufficient housing to <u>all</u> settlements in the Borough, with specific allocations for the villages in the Rural Area, including Little Gaddesden.</p> <p>The last bullet point states that the council will “Locate development to help support delivery of a 5 year housing land supply, as required by Government”. This should be deleted as the <u>location</u> of development has no impact at all on the 5 year housing land supply.</p>
Include files	
Number	Question 36
ID	LPIO16843
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO16911
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings

	<p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LP1016999
Full Name	Chris Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LP1017056
Full Name	Jade Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO17113
Full Name	Grahame Senior
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO17248
Full Name	Debbie Crooks Pam Moss
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit</p>

	<p>margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO17304
Full Name	Margaret and Andrew Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</p> <p>...</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO17360

Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>...</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO17412
Full Name	Lesley Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 36 below (copy of full response attached to question 46)</p> <p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The

	<p>headline principle should include the wording, "within urban capacity"</p> <ul style="list-style-type: none"> • Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LPIO17467
Full Name	Sara Bell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO17526
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please find attached a report (GFRA) about the proposed development of Tring.

	<p>...</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO17574
Full Name	MR DAVID BROWN
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 36 below (copy of full response attached to question 46)</p> <p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity" • Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LPIO17633
Full Name	Paul Hembury
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning & Development details my concerns comprehensively.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO17707
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>

Include files	
Number	Question 36
ID	LPIO17756
Full Name	Diana Woodward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express. BCA response to Question 36 below - full document attached to Question 46</p> <p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity" • Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LPIO17812
Full Name	John and Helen Osborne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p>

	It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.
Include files	
Number	Question 36
ID	LPIO17870
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO17928
Full Name	Dave Davies
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.

	<p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO17976
Full Name	Mr Michael Burbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I support most of the aims but the density should not reduce the quality of the houses or put unnecessary strain on infrastructure and street parking. It is important that if we are going to build lots of houses they should be something to be proud of that people want to live in even if we need to use more land.
Include files	
Number	Question 36
ID	LPIO18037
Full Name	mr Richard Lambert
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMEMNT) , my own views can be summarised in a handful of bullet point.

	<p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO18108
Full Name	Mr Graham Bright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO18165
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO18222
Full Name	Nicky and Dave Hulse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO18276
Full Name	Gail Skelton
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, <u>Option</u></p>

	<p>1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO18335
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO18362

Full Name	Plato Property Investments LLP
Company / Organisation	Plato Property Investments LLP
Position	C/O Aitchison Rafferty
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This Statement has been prepared to respond to the questions set out in the Issues and Options Consultation published by the Council in November 2017. It is submitted on behalf of Plato Property investments LLP in respect of a site located to the south east of the Mini dealership at London Road, Cow Roast HP23 5RE.</p> <p>This Statement should be read along with the Planning Statement attached at Appendix 1 (see Q 46 for attachment) which sets out the detailed planning case in support of the allocation of the site for housing in the emerging Local Plan.</p> <p>In summary, we consider that:</p> <p>We would like to comment on two of the Locational Principles, and suggest revised wording, as follows:</p> <p>The third bullet point states that the Council will “<i>Locate development at well-connected sustainable locations</i>”. We do not consider that new development should <u>only</u> be located at the most sustainable locations in the Borough, as to do so would prevent much needed new development in smaller settlements. Smaller settlements in the ‘Rest of the Borough’ are inevitably less sustainable than sites in the larger towns, but they have a need for new homes. However, some like Cow Roast, are more sustainable than others. It is considered that the council’s approach should be to allocate sufficient housing to <u>all</u> settlements in the Borough, including specific allocations for all of the individual settlements in the ‘Rest of the Borough’.</p> <p>The last bullet point states that the council will “Locate development to help support delivery of a 5 year housing land supply, as required by Government”. This should be deleted as the <u>location</u> of development has no impact at all on the 5 year housing land supply.</p>
Include files	
Number	Question 36
ID	LPIO18467
Full Name	Mrs Wendy Mclean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>Maximise the density of development, whilst ensuring it reflects local character. These seem incompatible.</p> <p>Locate development at well-connected sustainable locations. This suggests whatever area's chosen for development will continue to grow and grow and grow.</p> <p>Respect the character of the existing settlement pattern and restrict urban sprawl. Nothing stated so far has suggested this is the case.</p> <p>Protect the character and value of important landscapes, heritage and biodiversity. If difficult to understand the plan to protect the heritage of Shendish Manor while proposing to surround it with a 1000 strong housing estate.</p>
Include files	
Number	Question 36
ID	LPIO18503
Full Name	Melanine Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO18550
Full Name	Mrs Juliet Chodzko
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.</p>

	<p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO18596
Full Name	Captain Andrew Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO18642
Full Name	Lindy Weinreb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>Do you support the proposed locational principles?</p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity" Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LP1018689
Full Name	Hilary Abbott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different</p>

	<p>topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO18735
Full Name	Paul and Gillian Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’

consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

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

	<p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO18781
Full Name	Berkhamsted Citizens
Company / Organisation	Berkhamsted Citizens
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity” Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LPIO18830
Full Name	Lyndsay Slater
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive</p>

points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

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

BRAG response to Question 36 (please note full document is attached to Q46)

	<p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO18877
Full Name	Andrew and Margit Dobbie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when</p>

	<p>considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO18923
Full Name	Katherine Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>...</p>

	<p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO18947
Full Name	Rupert Symmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO19001
Full Name	Mrs Emma Robertson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development</p>

	associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.
Include files	
Number	Question 36
ID	LPIO19064
Full Name	Barbara Gainsley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</p> <p>Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.</p> <p>Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity" • Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LPIO19121
Full Name	Bill Ahearn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I wish to register my objections to some of the proposals under consideration on the grounds they are simply to

	<p>excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO19179
Full Name	Ms Sarah Hain
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO19237
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO19294
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Our family (4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town's infrastructure. We feel strongly that green belt land should be preserved for future generations</p> <p>GFRA Response to Question 36, full document</p>

	<p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LP1019348
Full Name	Stuart, Miranda & Melissa Kay
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different</p>

topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

No

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

Include files	
Number	Question 36
ID	LPIO19398
Full Name	Wai Tang and Greg Barfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	

Please note we are aware that the Berkhamsted Residents Action Group (BRAG) has responded in full to the "Issues & Options" consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.

We wish to add our concerns to the DBC local plan issues and options consultation.

We are particularly concerned about the following

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

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

No

	<ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO19444
Full Name	Philippa Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan.</p> <p>Question 36</p> <p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity" Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LPIO19499
Full Name	John Wignall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.

	<p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO19556
Full Name	Kevin Cullen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please refer to the attached report.(BRAG)</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO19614
Full Name	Mark Lawson and Sharon Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

<p>Your response - Please add your response here</p>	<p>I do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 36</p>
<p>ID</p>	<p>LPIO19670</p>
<p>Full Name</p>	<p>Vivienne Inmonger</p>
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Agent Name</p>	
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Your Opinion - Please state your opinion here</p>	<p>Yes</p>
<p>Your response - Please add your response here</p>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
<p>Include files</p>	

Number	Question 36
ID	LPIO19729
Full Name	John Inmonger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO19783
Full Name	Ben Barth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p>Question 36</p> <p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located

	<p>but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”</p> <ul style="list-style-type: none"> • Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LPIO19852
Full Name	Jon Esson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO19936
Full Name	Chris Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA)</p> <p>GFRA Response to Question 36, full document attached to question 46</p>

	<p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO19993
Full Name	mrs sue van rhee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO20050
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO20107
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	

Number	Question 36
ID	LPIO20165
Full Name	Sherry and Haydn Bond
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached a copy of the issues report for Tring. We love living and raising our family in a small market town. We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO20222
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p>

	<p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO20270
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO20325
Full Name	David Clarke

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO20383
Full Name	Deborah Turnbull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town.

	<p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO20431
Full Name	Jane Collis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO20492
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing in response to the Issues and Options consultation.</p> <p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO20540
Full Name	DR Brigitta Case
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46</p>

	<p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity” <p>Berkhamsted Citizens response</p> <p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity” • Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).
Include files	
Number	Question 36
ID	LPIO20587
Full Name	Christine Manning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5-year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity” • Very dense developments are not appropriate for edge-of-town developments (See LTP which seeks to reduce carbon emissions <i>inter alia</i>).

Include files	
Number	Question 36
ID	LPIO20610
Full Name	Ailsa Davis
Company / Organisation	HCC Development services, Property , Resources
Position	Principal Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The proposed locational principles are supported and emphasise the importance of selecting sites based upon their performance from a sustainability perspective, together with their ability to deliver the physical, social and community infrastructure necessary to support the development proposed in the Plan.
Include files	
Number	Question 36
ID	LPIO20659
Full Name	Jane Hawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36

ID	LPIO20715
Full Name	Keiron Wybrow
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO20763
Full Name	Christopher Townsend
Company / Organisation	
Position	Councillor, Tring Town Council
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)</p> <p>This is effectively a duplication of Policy CS1 Distribution of Development. There should be clarity on the precedence of Policy CS1 over the Location Principles.</p>
Include files	
Number	Question 36
ID	LPIO20811

Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No not all</p> <p>Maximise brownfield sites Yes but do not maximise density vertically.</p> <p>Support urban regeneration in Hemel Yes.</p> <p>Locate development at well connected sustainable locations Yes but No to green belt / green field development in Northchurch (Darrs Lane/ Bell Lane / Durrants Lane) and similar sites in Berkhamsted.</p> <p>Avoid areas at risk to flooding Yes.</p> <p>Respect the character of the existing settlement pattern and restrict urban sprawl. Yes</p> <p>Protect the character and value of important landscapes and biodiversity-Yes.</p> <p>Ensure that new development can be served by necessary infrastructure-Yes.</p> <p>Locate development to help delivery of a 5-year housing plan, as required by government-No</p> <p>Lack of suitable infrastructure limits development potential in Northchurch and Berkhamsted.</p>
Include files	
Number	Question 36
ID	LPIO20857
Full Name	Mr Iain Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would

	immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO20933
Full Name	Mr Jake Storey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I live in Berkhamsted and have witnessed the size of the small town growing in an unsustainable manner. As a result I joined SYBRA and also now BRAG. I have attached the BRAG response to your proposals</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO20988
Full Name	Mr & Mrs J.D Batty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and

comments be taken into account in your consideration of public responses.

The Berkhamsted Residents' Action Group(BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG's responses under our names so that a complete repetition of BRAG's submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council's submission.

Q33 to Q38.BRAG.We fully support BRAG's devastating analysis on what is the paramount issue before us.

BRAG response to Question 36 (please note full document is attached to Q46)

Question 36 *Do you support the proposed locational principles?*

No

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Berkhamsted Town Council response

Question 36 *Do you support the proposed locational principles?*

Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. The 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity".

Very dense developments are not appropriate for edge-of-town developments (see LTP which seeks to reduce carbon emissions *inter alia*).

Include files	
Number	Question 36
ID	LPIO21073
Full Name	julie owen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	<p>The attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO21138
Full Name	Sheron Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO21167
Full Name	St Albans Diocesan Board of Finance
Company / Organisation	St Albans Diocesan Board of Finance
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • SADBDF supports the Location Principles provided within the Plan. However, there is a query to why Hemel Hempstead is singled out as a particular area for Urban Regeneration, when the regeneration of all urban areas should be promoted as a positive opportunity for each area • SADBDF supports the point of making sure development is located to help support a delivery of 5- year housing supply. It should be made abundantly clear that this is a rolling requirement and reference should be made to the Housing Delivery Test
Include files	
Number	Question 36
ID	LPIO21214
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. This is contrary to Government Policy • Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO21262
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be taken into account. I strongly support their submission (below)</p> <p>The Chilterns Conservation Board considers that there is a crucial locational principle missing here:</p> <p>"Conserve and enhance the Chilterns AONB and its setting"</p>
Include files	
Number	Question 36
ID	LPIO21337
Full Name	Antony Harbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO21383
Full Name	Helen Kington
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO21408
Full Name	James Good
Company / Organisation	Angle Property Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Question 36: Do you support the proposed locational principles [Answer is No]</i></p> <p><u>Response:</u></p> <p>Yes/ No <u>Details:</u></p> <p>APL supports the Council's decision to apply locational principles to the distribution of housing and other development across the district. Several different distribution patterns are set out in the plan. APL supports the approach of distributing the growth in a balanced way, with additional housing and other uses for each settlement proportionate to the size and facilities of each settlement.</p> <p>The location principles should not necessarily be applied in direct sequence but sites should be considered against the criteria as a whole. Redevelopment of brownfield</p>

	sites should be a priority. It should be recognised that some brownfield sites are currently located within the Green Belt.
Include files	
Number	Question 36
ID	LPIO21426
Full Name	Mr R Smith and Mr A Lyell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1.31.1 The Landowners support the Location Principles provided within the plan; however, there is a query to why Hemel Hempstead is singled out as an area for Urban Regeneration, when the regeneration of all urban areas should be promoted as a positive opportunity for each area</p> <p>1.31.2 The Landowners support the point of making sure development is located to help support a delivery of 5-year housing supply; it should be made abundantly clear that this is a rolling requirement and reference should be made to the Housing Delivery Test</p>
Include files	
Number	Question 36
ID	LPIO21500
Full Name	Hightown Housing Association
Company / Organisation	Hightown Housing Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 36 Do you support the proposed locational principles? No</p> <p>We believe that it is not correct for the locational principles to ignore the essential need to release land from the Green Belt in order to secure the delivery of the necessary level of housing land. The appropriate and justified release of land from the Green Belt should be included as a locational principle.</p>
Include files	
Number	Question 36
ID	LPIO21518
Full Name	Mr Chris Briggs
Company / Organisation	St Albans City & District Council

Position	Spatial Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q.36 Locational principles – No</p> <p>12. Choosing growth locations (Section 10).</p> <p>SADC notes that agreement on the principles applied to selection of growth locations are now likely to be required for the 5 LPA HMA. The consultation (10.2) identifies some very important principles. However there are some aspects that are not clearly addressed.</p> <p>First and foremost, Green Belt is mentioned in the initial text, and is clearly integral to some of the location principles. However there is no overt analysis of the purposes of Green Belt policy in the locational principles (see 5 above). The presence or absence of Green Belt designation is clearly a central locational principle. There is a strong relationship to the way in which the reasonable alternatives for Plan target levels of growth are posed and analysed (see 6. above). From that point analysis of Green Belt purposes under a consistent methodology is certainly necessary. Some of the locational principles relate to this. This work clearly features in DBC's evidence, but appears to be omitted from mention in the criteria.</p>
Include files	
Number	Question 36
ID	LPIO21563
Full Name	Mrs Valerie Silverton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have read the proposals and strongly agree BRAG's responses.</p> <p>BRAG response to Question 36 (please note full document is attached to Q46)</p> <p>Question 36 <i>Do you support the proposed locational principles?</i></p> <p>No</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"

Include files	
Number	Question 36
ID	LPIO21620
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p>GFRA Response to Question 36, full document attached to question 46</p> <p>We support the proposed locational principles however it is important that those principles sufficiently addresses the distinctive character, pressures and infrastructure that is independently prescribed to the settlements within the Borough.</p> <p>It is our opinion that Hemel Hempstead quite clearly has the ability to incorporate the vast majority of development associated with the Borough and if the locational principles are applied correctly, underpinned by well evidenced conclusions, it is considered that that is the single conclusion that can be taken forward.</p>
Include files	
Number	Question 36
ID	LPIO21648
Full Name	Silversaw Ltd
Company / Organisation	Silversaw Ltd
Position	
Agent Name	Mark Novelle
Company / Organisation	CBRE
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposed Locational Principles at para 10.2.4 are reasonable and provide a suitable approach to the delivery of housing within DBC.

	<p>On review of the preceding paragraphs (10.2.2 and 10.2.3) these outline that evidence (Green Belt Stage 1 and 2 Report) suggests that the Green Belt within DBC is predominantly fulfilling its required role, however there are some areas which have been identified as not fully meeting all the Government's criteria and would therefore be suitable for release from the Green Belt.</p> <p>It is felt that as this is stated in both the evidence base and the documentation the principle of Green Belt release should also be developed into a locational principle. Notwithstanding the lack of clarity on the overall housing numbers to be provided it would be sensible and reasonable to include a locational principle which accepted the limited release of identified weakly performing Green Belt should housing need be established.</p>
Include files	
Number	Question 36
ID	LPIO21693
Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • CPUK supports the Location Principles provided within the plan; however, there is a query to why Hemel Hempstead is singled out as a particular area for Urban Regeneration, when the regeneration of all urban areas should be promoted as a positive opportunity for each area. • CPUK supports the point of making sure development is located to help support a delivery of 5- year housing supply; it should be made abundantly clear that this is a rolling requirement and reference should be made to the Housing Delivery Test.
Include files	
Number	Question 36
ID	LPIO21720
Full Name	Roger Saller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.

To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perspective on what made the town attractive and what is now at risk.

Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response

	<ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO21768
Full Name	Elizabeth Hamilton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In respect of Question 36 and the Locational Principles, these are not adequate as they make no mention of protection of the Green Belt specifically.
Include files	
Number	Question 36
ID	LPIO21790
Full Name	Sarth Ltd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>In applying the locational principles, the Council should seek to</p> <ul style="list-style-type: none"> realise opportunities which offer the opportunity to achieve improvements in local character through the redevelopment of sites, regenerating sites through identifying more appropriate, sustainably located land uses, locating development in well connected sustainable loctions <ul style="list-style-type: none"> avoiding areas at high risk of flooding (<i>and through proactive positive planning reducing and mitigating issues of flood risk and surface water and drainage management</i>) respecting the character of the settlement and restricting urban sprawl <ul style="list-style-type: none"> Protecting character and value of landscapes, heritage and biodiversity (<i>and where possible improving biodiversity</i>)

	<p>- ensuring new development can be served by necessary infrastructure</p> <p>- ensure new development can support delivery of a 5 year housing land supply, as required by Government</p> <p>Our client's site at Billet Lane, south of the Grand Union Canal scores positively against all of these points if assessed in terms of the potential contribution residential development could deliver.</p> <p>These responses on the Issues and Options consultation should be read in conjunction with the separately submitted representations and supporting documents which have been forwarded to the Council in relation to :</p> <p>The Call for Sites 2017</p> <p>The Brownfield Land Register consultation 2017</p> <p>We would welcome the opportunity of discussing these representations with the Local Planning Authority once officers have had the opportunity of digesting the submissions.</p>
Include files	
Number	Question 36
ID	LPIO21811
Full Name	Professor Jim McManus
Company / Organisation	Public Health Service (HCC)
Position	Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Where should new development be built?</p> <p>The broad issue of where new homes should be built needs to consider health from the outset, in terms of both how development can promote good health and wellbeing through design, and also how development may impact on physical health and mental wellbeing. A Health Impact Assessment would be an important way of supporting this and with this in mind we would ask that the Local Plan sets out a policy requirement that all development proposals undertake a Health Impact Assessment⁴ at an early stage.</p> <p>Public Health does not take a view on specific locations for future growth. However the spatial and temporal scale of likely development in the Borough is such that there could be significant impacts on public health and wellbeing through environmental and socio-economic pathways. We recommend that in identifying these locations, consideration must be given to how development:</p> <ul style="list-style-type: none"> • ensures accessibility to all and promotes social inclusion; • is proactive in the promotion of healthy behaviours and lifestyles for the new community; especially through good quality, safe, easily accessible

	<p>infrastructure for walking, cycling and leisure and reducing need for vehicle use;</p> <ul style="list-style-type: none"> enhances the opportunities for the existing community to engage in healthy behaviours; especially through good quality, safe, easily accessible infrastructure for walking, cycling and leisure reducing need for vehicle use; is positively planned to reduce the impact on, and exposure to, local air
Include files	
Number	Question 36
ID	LPIO21832
Full Name	W Lamb Ltd
Company / Organisation	W Lamb Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> Yes, however it is considered that the Council's stated Objective of promoting Hemel Hempstead as a focus for homes, jobs and strategic services should also be included as a specific locational principle. This is necessary to secure the required investment and regeneration of the town, as emphasized in the draft Settlement Hierarchy Study (October 2017). The proposed locational principles should also recognise the contribution that urban extensions can make to the sustainable growth of the larger settlements, in particular Hemel Hempstead, as identified in the Local Vision for the town. As highlighted previously, properly planned urban extensions are an efficient and sustainable solution to housing need and offer greater opportunities to improve physical, social and green infrastructure compared to smaller piecemeal development. This is not currently reflected in the proposed locational principles.
Include files	
Number	Question 36
ID	LPIO21903
Full Name	Louis Quail
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>Please see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the augment for building on greenbelt land should only be one of last resort , there are plenty of other options left before launching off this one way route .</p> <p>Berkhamsted Residents Action Group response:</p> <ul style="list-style-type: none"> • Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”
Include files	
Number	Question 36
ID	LPIO21972
Full Name	Thomas and Margaret Ritchie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council's response:</p> <p>Yes, but they cannot be achieved with these proposals. Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. The 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Very dense developments are not appropriate for edge-of-town developments (see LTP which seeks to reduce carbon emissions <i>inter alia</i>).</p>
Include files	
Number	Question 36
ID	LPIO21999

Full Name	Mr Paul Phipps
Company / Organisation	Whiteacre Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes. We support 'Option C' and the principle that locations for growth should include 'second tier' settlements such as Bovingdon. It is not reasonable to expect only the largest towns to deliver all of the housing need within the Borough. Smaller settlements can contribute to the supply of housing, and they often benefit from the enhanced sustainability and economic viability brought about by managed growth, of the type and scale envisaged in Option C.
Include files	
Number	Question 36
ID	LPIO22049
Full Name	Gallagher Estates
Company / Organisation	Gallagher Estates
Position	
Agent Name	Mrs Hanna Staton
Company / Organisation	Pegasus Group
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The locational principles with the exception of the final listed principle: "<i>Locate development to help support delivery of a five-year housing land supply, as required by Government.</i>" are agreed.</p> <p>It should be rephrased to state 'allocate a mix of size and types of sites in different locations in the Borough'. Five year land supply is a measure of deliverability and therefore it seems more appropriate to set out those factors that will maximise deliverability. As currently phrased, it suggests that lots of small sites should be identified, which is not what was necessarily meant. It is important that this overall objective of "<i>boost[ing] significantly the supply of housing</i>" is not overlooked in favour of a narrow focus on the most immediate five-year period. As discussed above, the rate at which sites are delivered can be unpredictable and, as such, it is essential that sufficient sites are released early in the plan period to allow for homes to be delivered with contingency for unexpected delays.</p> <p>It is also suggested that the Council clarifies that the locational principles will apply equally and are not listed in order of priority. As it could be interpreted as a sequential approach.</p>

Include files	
Number	Question 36
ID	LPIO22084
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The following locational principles are supported</p> <ul style="list-style-type: none"> • Maximise the use of brownfield land for • Maximise the density of development, whilst ensuring it reflects local • Support urban regeneration – particularly of Hemel Hempstead new • Locate development at well-connected sustainable • Avoid areas at high risk of • Respect the character of the existing settlement pattern and restrict urban • Protect the character and value of important landscapes, heritage and • Ensure that new development can be served by necessary • Locate development to help support delivery of a 5-year housing land supply, as required by Government. <p>However, we also consider that additional locational principles should be added to the above list:</p> <ul style="list-style-type: none"> • The focus of development should be on the 1st (Main) and 2nd tier (Market) • Protect the separation of Kings Langley from its neighbours, Hemel Hempstead, Hunton / Abbots Langley / Leavesden <p><u>QUESTION 36 Locational Principles - Summary Representation and Response Sought:</u> Add a further locational principle:</p> <ul style="list-style-type: none"> • The focus of development should be on the 1st (Main) and 2nd tier (Market) towns; • Protect the separation of Kings Langley from its neighbours, Hemel Hempstead, Hunton / Abbots Langley / Leavesden
Include files	
Number	Question 36
ID	LPIO22105
Full Name	Crest Nicholson
Company / Organisation	
Position	
Agent Name	Sarah

	Moorhouse
Company / Organisation	Lichfields
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The final locational principle – ‘Locate development to help support delivery of a 5 year housing land supply, as required by Government’ needs to be stronger and should read: ‘Locate development to ensure the delivery of a 5 year housing land supply, as required by Government’.
Include files	
Number	Question 36
ID	LPIO22150
Full Name	Mrs Hayley Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO22193
Full Name	Mr Peter Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 36
ID	LPIO22238
Full Name	Miss Sophie Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	

Include files	
Number	Question 36
ID	LPIO22462
Full Name	Ashleigh Michnowiec
Company / Organisation	Harrow Estates plc
Position	
Agent Name	Mrs Sam Ryan
Company / Organisation	Turley Estates
Position	Director
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The locational principals identified by the Council are generally appropriate to undertake a high-level assessment of potential sites to deliver sustainable patterns of development. However, Harrow Estates plc consider that other socio-economic factors should also be considered; in particular the submitted Local Needs Assessment identifies a clear need to address the socio-economic issues of affordability and ageing population in Tring that has occurred as a consequence of historically failing to deliver sufficient family housing in the town. This is a strategic issue that should be addressed through the spatial distribution of housing in the borough and allocation of a sufficient quantum of development in Tring.</p> <p>While it is important to make the best use of land, paragraph 50 of the Framework requires local planning authorities to, inter alia, <i>'plan for a mix of housing(such as, but not limited to families with children.....)</i>. Recent housing development in Dacorum has predominantly been 1 and 2-bed room properties and the SHMA identifies a particular need for new family housing with 3+ bedrooms. It is important that the new Local Plan responds to both the requirements of the Framework and the council's own evidence base to ensure that sites are also identified to accommodate family housing - this may necessitate a lower density of development in appropriate locations.</p>
Include files	
Number	Question 36
ID	LPIO22517
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>Please find below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below)</p> <ul style="list-style-type: none"> Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity"
Include files	
Number	Question 36
ID	LPIO22567
Full Name	Mrs C Longbottom
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support all answers and comments to the Issues & Options Consultation document noted on the Berkhamsted Town Council website</p> <p>Yes, but they cannot be achieved with these proposals.</p> <p>Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. The 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity".</p> <p>Very dense developments are not appropriate for edge-of-town developments (see LTP which seeks to reduce carbon emissions <i>inter alia</i>).</p>
Include files	
Number	Question 36
ID	LPIO22587
Full Name	Berkhamsted Schools Group
Company / Organisation	The Berkhamsted Schools Group
Position	
Agent Name	Kevin Rolfe
Company / Organisation	Aitchison Raffety
Position	Group Director, Development & Planning
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>We would like to comment on two of the Locational Principles, and suggest revised wording, as follows:</p> <p>The second bullet point states that the council will “Maximise the density of development, whilst ensuring it reflects local character”. We consider that the words “reflect local character” could be interpreted to mean that development should always replicate (i.e copy) the existing densities. This would not be appropriate and it is suggested that the following wording should be used instead “<i>Maximise the density of development, whilst ensuring it does not harm the character of the local area</i>”.</p> <p>The last bullet point states that the council will “Locate development to help support delivery of a 5 year housing land supply, as required by Government”. This should be deleted as the <u>location</u> of development has no impact at all on the 5 year housing land supply.</p>
Include files	
Number	Question 36
ID	LPIO22637
Full Name	Mr & Mrs Mehew
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We write as residents of [REDACTED] [REDACTED]</p> <p>in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) (see comments LPIO18384, 18385) and the draft response prepared by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council Response:</p> <p>Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. The 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Very dense developments are not appropriate for edge-of-town developments (see LTP which seeks to reduce carbon emissions <i>inter alia</i>).</p>

Include files	
Number	Question 36
ID	LPIO22714
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 36 – Do you support the proposed locational principles?</p> <p>The Natural, Historic & Built Environment Advisory Team recommends that the historic environment is a locational principle. The NPPF (annex 2 glossary) defines this as “<i>All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.</i>” This section currently uses the term <i>heritage</i>.</p> <p>We support all of the locational principles set out. Points 1–4 and 8 are directly relevant to transport matters, i.e. managing transport impacts, reducing the need to travel as far as often, opportunity to improve transport provision in particular for public transport and active modes, and deliverability of needed mitigation.</p> <p>Locational principles:</p> <ul style="list-style-type: none"> • Maximise use of brownfield land for development • Maximise density of development, whilst ensuring it reflects local character • Support urban regeneration – particularly Hemel Hempstead town centre • Local development at well-connected sustainable locations • Avoid areas at high risk of flooding • Respect the character of existing settlement pattern and restrict urban sprawl • Protect character and value of important landscapes, heritage and biodiversity • Ensure that new development can be served by necessary infrastructure • Locate development to help support delivery of a 5-year housing land supply <p><u>Maximise use of brownfield land</u></p> <p>Yes, likely to be easier to plan so as to be well connected with existing built up area.</p> <p><u>Maximise the density of development</u></p> <p>In accessible locations, or where can be made accessible by sustainable transport should be added.</p> <p><u>Support urban regeneration</u></p> <p>Yes, so that services and facilities are maintained and / or enhanced to reduce need to travel.</p>

	<p><u>Locate development at well-connected sustainable locations</u></p> <p>Or where can be made so, yes. Ensure that development can be served by the necessary infrastructure. It is essential that new development is planned with sustainable transport infrastructure included – bus stops / new bus routes, pedestrian and cycle routes.</p> <p>Herts Ecology supports the locational principle to <i>Protect the character and value of important landscapes, heritage and biodiversity.</i></p>
Include files	
Number	Question 36
ID	LPIO22822
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes
Include files	

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	411
Filtered Respondents	400
Questions	<p>Question 37</p> <p>a) New settlement (town or village);</p> <p>b) Rural growth;</p> <p>c) Export growth to another Council area;</p> <p>d) Use greenfield land before brownfield land; and</p> <p>e) Significant expansion of a large village(s)</p> <p>Yes / No</p> <p><i>If no, please explain your reasons, with reference to evidence where available.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	ID-4764273-QUESTION-37
Pivot	<i>(none)</i>
Document Name	Question 37 - Summary Report
Created on	2019-04-23 09:41:23
Created by	Strategic Planning Admin

Your Opinion

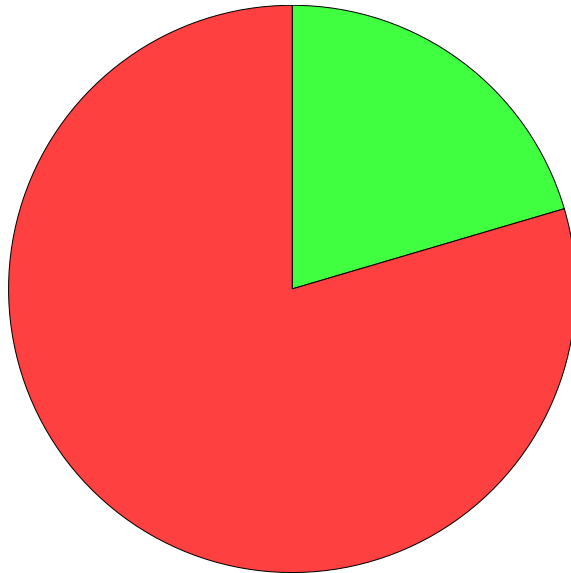
Question responses: 411 (100.00%)

Question 37

Do you agree with the rejection of the following growth distributions:

- a) New settlement (town or village); b) Rural growth;
 c) Export growth to another Council area; d) Use greenfield land before brownfield land; and
 e) Significant expansion of a large village(s)

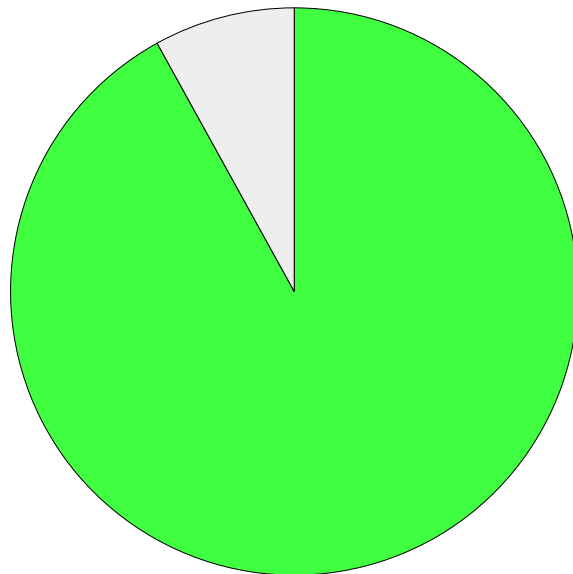
Yes / No



	% Total	% Answer	Count
■ Yes	20.44%	20.44%	84
■ No	79.56%	79.56%	327
Total	100.00%	100.00%	411

Responses

Question responses: **378 (91.97%)**



	% Total	% Answer	Count
Responses	91.97%	100.00%	378
No Response	8.03%	--	33
Total	100.00%	100.00%	411

Supporting evidence

Question responses: **6 (1.46%)**



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	1.46%	100.00%	6
■ Responses with No Uploads	98.54%	--	405
Total	100.00%	100.00%	411

Issues and Options All Responses to Question 37

Number	Question 37
ID	LPIO26
Full Name	Mrs Jennifer Ponsford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO104
Full Name	Mr John Lilley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	A Focus on three towns
Include files	
Number	Question 37
ID	LPIO348
Full Name	Mr David Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO470
Full Name	Ms Julia Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A standalone development on Bovington Airfield ('New Bovington Village?') would appear to offer a very good solution to many of the issues raised re infrastructure, access, etc. It could follow the template of other successful developments, such as Leavesden Airfield or Hatfield Airfield. I think the council should explore this option with the land owners.
Include files	
Number	Question 37
ID	LPIO482
Full Name	Mr Robert Spence
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenfield land should not be considered before brownfield land.
Include files	
Number	Question 37
ID	LPIO574
Full Name	Mrs Caroline Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Focus on the 3 main towns.
Include files	
Number	Question 37
ID	LPIO595
Full Name	Mrs Elaine Tuck
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	It is difficult to understand why option c) which could adversely impact on the character of villages and their infrastructure has been included when it shares many similarities with the rejected option 'Significant expansion of a large village'. I feel that significant expansion of a large village and option 3) should both be rejected. A new settlement could be a viable option depending on site.
Include files	
Number	Question 37
ID	LPIO596
Full Name	Mr Adam Tuck
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	It seems illogical that route C above (spreading the housing across the borough) should still be considered when it involves significantly expanding several villages -- an option which has already been rejected on the grounds that 'many of [these villages] do not have easy access to the key services and facilities that can be found at larger settlements. This would also lead to substantial changes to the compact and rural character of these villages.'
Include files	
Number	Question 37
ID	LPIO689
Full Name	Mr David Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO779
Full Name	Mr John Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	With the added proviso that there must be no development on the Green Belt .
Include files	
Number	Question 37
ID	LPIO890
Full Name	Mr Ian Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	c) I disagree that the option that export growth to another Council should not be considered especially in relation to the St Albans proposed development just east of Hemel Hempstead on the other side of the M1
Include files	
Number	Question 37
ID	LPIO891
Full Name	Mr Ian Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Hemel Hempstead is best equipped for expansion as a town with facilities and infrastructures already in place.
Include files	
Number	Question 37
ID	LPIO944
Full Name	Ms Stephanie Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Contrate on the three towns but keep in mind Shendish is part of Kings Langley village, not the towns. Also, greenfield land should be a last resort. As mentioned

	previously, considering Bovingdon Airfield may be an option.
Include files	
Number	Question 37
ID	LPIO1028
Full Name	Mr Dominic Lawrance
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	On the basis of the consultation document, I am not satisfied that the Council have given sufficient consideration to the possibility of a new settlement, as an alternative to the proposed expansion at Hemel, Berkhamsted and Tring. Respondents have referred to the possibility of development at Bovingdon Airfield; why is there no discussion of this in the consultation document? The cynical would suspect that it is more attractive for the Council to propose developments at sites which have been "landbanked" by developers.
Include files	
Number	Question 37
ID	LPIO1050
Full Name	mr Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggests that DBC have not done that
Include files	
Number	Question 37
ID	LPIO1119
Full Name	Ms Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Exporting to another council area should not be rejected - in particular the St Albans land east of Hemel.
Include files	
Number	Question 37
ID	LPIO1213
Full Name	Miss Kylie Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	It is noted that the council have already stated that they reject 'significant expansion of a large village(s)'. Given this is the case DBC should remove proposals to build on Green Belt, in particular reference to KL-h3 from this consultation.
Include files	
Number	Question 37
ID	LPIO1227
Full Name	Mr Bernard Richardson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A standalone development on Bovingdon Airfield ('New Bovingdon Village'?) would appear to offer a very good solution to many of the issues raised re infrastructure, access, etc. It could follow the template of other successful developments, such as Leavesden Airfield or Hatfield Airfield. I think the council should explore this option with the Airfield landowners.
Include files	
Number	Question 37
ID	LPIO1285
Full Name	Sarah Harper
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	New housing should be in existing urban areas and on brownfield sites. There is no justification for damaging our communities and countryside
Include files	
Number	Question 37
ID	LPIO1306
Full Name	Mrs Angela Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why reject the building of two or three new small towns with their own infrastructure and new community on brownfield sites? In this proposal, the whole area will eventually become one large (and ugly) sprawl.
Include files	
Number	Question 37
ID	LPIO1334
Full Name	Mrs Karen Barnes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO1339
Full Name	Mrs Catherine Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is no need to expand any towns or villages other than Hemel Hempstead as it can take the growth and has all of the infrastructure in place. Green belt land should not be considered. Significant expansion of villages then makes them towns and not villages.
Include files	
Number	Question 37
ID	LPIO1360
Full Name	Mr Andrew Calderwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	(a) A new town should not be rejected even if it will take years to agree and implement – the new plan is for the period to 2036. (c) Where a neighbouring Council area can accommodate (and is a sustainable location for) growth then this option should not be rejected. (d) Agree (but implement in Site Appraisals documents) (e) Agree
Include files	
Number	Question 37
ID	LPIO1415
Full Name	Mr Matt Clarke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Expand Hemel Hempstead as there are enough sites to allocate for future need and no green belt development Master plan future requirements taking into account future change and planning for this and retain sites for this.
Include files	
Number	Question 37
ID	LPIO1512
Full Name	Mr Chris Marks
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Hemel Hempstead should be developed first and can take the number of housing needed. There is no need to build in Kings Langley, Bovingdon or Tring and Berkhamsted.
Include files	
Number	Question 37
ID	LPIO1551
Full Name	MR PETER SUMMERFIELD
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A new settlement (town or village) should not be rejected for consideration. I agree with the comments made by Ms Julia Marshall regarding Bovingdon airfield and believe that the council should actively encourage the landowners to put forward this as a possible site. Greater focus for growth should be on Hemel Hempstead as this is the main employment area, the infrastructure is there although it would need some serious improvement.
Include files	
Number	Question 37
ID	LPIO1584
Full Name	Linda Hattersley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Another Council area could be considered - St Albans, or other areas in South East/the North - plus the Govt could do so much to unlock spare houses/land - they need to be challenged to : <ul style="list-style-type: none"> • force overseas owners of properties in London to rent them out at affordable rates - so many are currently empty, leading to "dead" buildings • force owners of empty properties to sell/rent within a certain time

	<ul style="list-style-type: none"> force builders with landbanks to use the land - they should not be allowed to block a plan to expand Hemel if that is the best housing solution for the nation
Include files	
Number	Question 37
ID	LPIO1640
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO1678
Full Name	Jenny Thorburn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The focus should be on Hemel Hempstead as there is still the most scope there to improve the town structure by well planned higher density development. Berkhamsted is at capacity apart from a few remaining small sites.
Include files	
Number	Question 37
ID	LPIO1901
Full Name	Mr Richard Case
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> Export to another Council area should not be rejected, specifically the St Albans land east of Hemel Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report

	<p>requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO1931
Full Name	ms V Earle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO1960
Full Name	Mr Robert Emberson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>If all the extra housing required cannot be accommodated on brownfield sites (mainly within the envelope of existing settlements, and the majority within the only large town, Hemel Hempstead), I think a new settlement should be considered at this stage (Bovingdon airfield). This is in view of the proposed developments all being round the smaller towns on irreplaceable Green Belt farmland, & these towns having</p>

	already suffered a large number of developments, with consequent excess pressure of their infrastructure of Roads, Schools & medical facilities. Also I think it might be possible for the villages to have small developments, possibly discretely sited within wooded areas, of exclusively genuinely affordable housing, mainly for rent from Housing Associations, the Council, or other suitable bodies; or if for sale with restrictions on resale only to local residents & such developments as wished by the villages. All small developments to be included in the housing figures as otherwise it looks as if the governments targets are not being met.
Include files	
Number	Question 37
ID	LPIO2043
Full Name	Mrs Christine Mabley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Focusing growth in Hemel Hempstead with lesser degrees in Berkhamsted and Tring is just setting up an even worse situation than now. Better to disperse the growth round more localities.
Include files	
Number	Question 37
ID	LPIO2081
Full Name	Mr Christopher Giddings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	By not considering rural growth towns that already have limited facilities will continue to suffer. Limited and high quality development of rural areas should be actively promoted by the council.
Include files	
Number	Question 37
ID	LPIO2176
Full Name	Mr Les Mosco
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel and RAF Halton. In Core Strategy Inspection the Inspector's report requested a partial review containing... (b) <i>the role and function of Green Belt...</i>(c) <i>the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum</i>. The Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. In addition, the viability of RAF Halton should be considered, as a potential site for a significant new town.</p> <p>I agree strongly with rejecting "Use greenfield land before brownfield land" but in this document the plan does not do that.</p>
Include files	
Number	Question 37
ID	LPIO2197
Full Name	Mrs Karen Mellor
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>(a) disagree: I would like to see Dacorum (cross border collaboration with other counties if necessary) carefully consider a decently designed forward thinking small town somewhere (despite the fact that that may take us to past 2036). A new town that would fully embrace all of the environmental and ecological objectives set out in this Plan and the Current Core Strategy while combining some 'realistic' employment growth. I disagree with building on green belt within towns where it provides, a health, ecological and environmental barrier, however, I may be persuaded to support a small new town built on green belt land, but , surrounded by further green belt land for health and well being etc., as long as it was built in a mindful way to support all ages and to zero carbon sustainable standards and future</p>

	<p>proofing. I do not approve of clone towns or shopping centres catering to Big Co's or corporations.</p> <p>b) disagree. It depends what sort of rural growth one is talking about. Growth in rural community growing schemes which can provide low food miles, jobs and health benefits are good. I consider the Farm shop at Wayside Farm to be good rural growth. But, growth for pure commuters and that which ensures money flowing out of the local community is not good and should be rejected.</p> <p>(c) Where a neighbouring Council area can accommodate (and is a sustainable location for) growth then this option should not be rejected.</p> <p>(d) Agree with rejection</p> <p>(e) Agree with rejection if the infrastructure cannot be upgraded to support it or greenfield land has to be used.</p>
Include files	
Number	Question 37
ID	LPIO2223
Full Name	Mrs Melanie Flowers
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I agree with the conclusions with the exception of rejecting the development of a new settlement. I feel that there is the potential for this if Dacorum were to work in conjunction with surrounding borough. A new settlement with its own infrastructure would be an attractive prospect and would not increase existing infrastructure issues in our towns and villages. I feel that this has been rejected as it is not an easy or quick option for the planners.
Include files	
Number	Question 37
ID	LPIO2295
Full Name	mr David van Rhee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37

ID	LPIO2347
Full Name	Mr George Bull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO2381
Full Name	Mr Tom Bloch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Exporting growth to another area should be considered, in co-operation with that area. This applies particularly to St. Albans which is proposing to export growth to Dacorum. We agree with the other 4 points.
Include files	
Number	Question 37
ID	LPIO2384
Full Name	Mr Tom Bloch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Should consider exporting growth to other areas, to co-operation with those areas. This applies particularly to St. Albans which is proposing to export growth to Dacorum. We agree with the other four points
Include files	
Number	Question 37
ID	LPIO2427
Full Name	Mr David Glenister
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why is there no consideration to build on old airports like Bovingdon and Long Marsdon. With appropriate infrastructure and services added to existing would seem to be worth considering.
Include files	
Number	Question 37
ID	LPIO2456
Full Name	Dr Nick Hodsdon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The creation of new settlements should be reconsidered as this would also include and address most of the infrastructure and some of the environmental issues with a policy of expansion Greenfield sites should only be considered after all the potential brownfield development sites have been developed Growth should be export, not to other council area but up North - what happened to the government great Northern Powerhouse policy? Both rural growth and expansion would lead to the loss of character of the area and villages and the council are right not to consider this option
Include files	
Number	Question 37
ID	LPIO2502
Full Name	Mr Timothy Copeman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO2604

Full Name	Mr Paul Crosland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The 'export to another Council' option should not be rejected. This is specifically related to the Gorchambury lands east of Hemel Hempstead. Councils adjacent to each other have a duty to co-operate but St. Albans DC has refused to do so. The eastward expansion of Hemel Hempstead would have most effect on Dacorum in terms of physical and social infrastructure so it is only reasonable that this housing should contribute to the fulfilment of Dacorum's housing need projections.
Include files	
Number	Question 37
ID	LPIO2672
Full Name	Mrs Sue Lower
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is an inconsistency
Include files	
Number	Question 37
ID	LPIO2675
Full Name	Mrs Sue Lower
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is an inconsistency in policy here as rural growth and significant expansion of a large village would surely support the strategic economic policy which supports commercial enterprise and employment opportunities in market towns and villages to support rural enterprise. I cannot see how this strategic policy can be met by excluding rural growth and/or significant expansion of a large village(s)
Include files	

Number	Question 37
ID	LPIO2687
Full Name	Mr Alan Andrews
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No need to destroy villages. Other alternatives can be found. Why destroy sites used by wildlife (eg shendish manor).
Include files	
Number	Question 37
ID	LPIO2833
Full Name	mrs Gillian Hooper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Hemel should be focus of new developments
Include files	
Number	Question 37
ID	LPIO2849
Full Name	Mr Cyril Mills
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The airfields mentioned could be seen as a new settlement. The concept of exporting growth should not be immediately discounted and may make sense depending what is planned in adjoining areas.
Include files	
Number	Question 37
ID	LPIO2892
Full Name	Mr Antony Harbidge
Company / Organisation	Berkhamsted Residents Action Group (BRAG)
Position	Chairman

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO2933
Full Name	Mr Kenneth Watts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO2981
Full Name	Mr Ivor Eisenstadt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Option B is the most appropriate of those listed. However, a new town crossing the existing artificial county boundaries, would allow sufficient housing to be built with appropriate road connections and infrastructure. This would reduce the need to squeeze more and more housing into our existing towns that are already at maximum capacity. We need our officials to be thinking outside of their restricted remits and get together to create towns fit for the 21st century rather than destroying our existing towns target by target.
Include files	
Number	Question 37
ID	LPIO2982
Full Name	Mr Ivor Eisenstadt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Option B is the most appropriate of those listed. However, a new town crossing the existing artificial county boundaries, would allow sufficient housing to be built with appropriate road connections and infrastructure. This would reduce the need to squeeze more and more housing into our existing towns that are already at maximum capacity. We need our officials to be thinking outside of their restricted remits and get together to create towns fit for the 21st century rather than destroying our existing towns target by target.
Include files	
Number	Question 37
ID	LPIO3015
Full Name	Mr Paul Stanbridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO3106
Full Name	mr hugh siegle
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	It is not right to export to another Council area but this is effectively what St Albans are proposing by building on our boundary and using our infrastructure but not allowing a contribution to Dacorum's housing target.
Include files	
Number	Question 37
ID	LPIO3117
Full Name	Mr John Whiteman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Given the scale of the expansion envisaged, and the time-frame, a new settlement should be considered and a new town sharing growth with (not exporting it to) adjacent authorities
Include files	
Number	Question 37
ID	LPIO3242
Full Name	Mr George Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Growth should be focused on the 3 main towns. Option 1A
Include files	
Number	Question 37
ID	LPIO3436
Full Name	Mrs Diana Calderwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A new settlement or town should be considered if the demand for so many homes is justified but not on Green Belt or AONB land and the land to east of Hemel should be counted as apart of that (with the St Albans Council) as those will use the infrastructure within Dacorum.
Include files	
Number	Question 37
ID	LPIO3451
Full Name	Mrs Ann Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This is not a yes no question. The proposals should be concentrated on the three main towns and on brownfield land before another other option is considered.
Include files	
Number	Question 37
ID	LPIO3493
Full Name	Mrs Louise Saul
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Another council could be considered e.g. St Albans
Include files	
Number	Question 37
ID	LPIO3523
Full Name	Mr Ashley Martin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Rejection of the Gorhambury land east of Hemel Hempstead should not have been rejected We must use brownfield land before attempting to wipe away our green belt, but this review by DBC is not in compliance with that principle
Include files	
Number	Question 37
ID	LPIO3596
Full Name	Mrs Sandra Jackson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	All of these options you are proposing have significant faults, because they are based on the flawed concept that growth must be made using Green Belt land or green areas. Dacorum is full, so growth needs to be 'exported' to another district within Hertfordshire that has more space and infrastructure ability. Dacorum Borough Council should be fighting for this, rather than acquiescing to the demands of Herts County Council.
Include files	
Number	Question 37
ID	LPIO3678
Full Name	Mr Steven Wallis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes we should preserve green spaces
Include files	
Number	Question 37
ID	LPIO3737
Full Name	Mr Andrew Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO3861
Full Name	Mrs Suzette Phair
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The possibility of a new settlement should not be dismissed as it could be key to providing a long term sustainable solution without creating high density urban sprawl and loss of green belt land.
Include files	
Number	Question 37
ID	LPIO3930
Full Name	Mr B. Bradnock
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see paragraph 2.37 and 2.38 in attached report.
Include files	Local Plan Issues and Options (12)
Number	Question 37
ID	LPIO3981
Full Name	Mr Tim Varley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO4007
Full Name	Mr John McCombe

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LP104036
Full Name	Mr R. Latham
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see paragraph 2.37 and 2.38 in attached report.
Include files	Local Plan Issues and Options (28)
Number	Question 37
ID	LP104043
Full Name	dr kim goode
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LP104068
Full Name	Mr Oliver Fairfull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	The council need to push back aggressively on plan by St Albans to build their quota of house in East Hemel. I agree Hemel should be the focus area of all building, already having the infrastructure to support additional residents and the space to expand. Proportionately this has the least impact on the town than building heavily in Tring and Berkhamsted.
Include files	
Number	Question 37
ID	LPIO4069
Full Name	Mr Oliver Fairfull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The council need to push back aggressively on plan by St Albans to build their quota of house in East Hemel. I agree Hemel should be the focus area of all building, already having the infrastructure to support additional residents and the space to expand. Proportionately this has the least impact on the town than building heavily in Tring and Berkhamsted.
Include files	
Number	Question 37
ID	LPIO4091
Full Name	Mr M. Chester
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see paragraph 2.37 and 2.38 in attached report.
Include files	Local Plan Issues and Options (44)
Number	Question 37
ID	LPIO4162
Full Name	Mr Graham Hoad
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As a resident of Tring I would favour option B.
Include files	
Number	Question 37
ID	LPIO4169
Full Name	Mr D. Smith
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see paragraph 2.37 and 2.38 in attached report.
Include files	Local Plan Issues and Options (60)
Number	Question 37
ID	LPIO4174
Full Name	Mr Peter Howard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	New settlements: Bovingdon airfield would seem to be a good location for such a settlement Export growth to another council: I agree with others that co-operation with St Alban's could allow for significant housing
Include files	
Number	Question 37
ID	LPIO4204
Full Name	Mr Douglas Gurney
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Expand in the largest town first where there is the infrastructure.
Include files	

Number	Question 37
ID	LPIO4265
Full Name	Ms Alison Sams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Export to another Council area should be in place, especially St Albans land east of Hemel
Include files	
Number	Question 37
ID	LPIO4295
Full Name	Mr Alan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The defining priorities under this question should be the identification and allocation of brownfield land both within urban areas and previously developed land elsewhere before any greenfield land or Green Belt sites. This fundamental principle reflects advice within the NPPF to make most efficient and effective use of available land, protection of the Green Belt and protection of the special character and constraints of the Borough. There should also be greater cross-boundary co-operation with allocations to the east of Kings Langley in Three Rivers and at Gorhambury, East Hemel in St Albans contributing towards the needs of Dacorum. This is based on the strong links of these areas with Kings Langley and Hemel Hempstead respectively. Option 1A: Growth should be focused on the three main towns of Hemel Hempstead, Tring and Berkhamsted is the obvious choice..
Include files	
Number	Question 37
ID	LPIO4322
Full Name	Mrs Caroline Hargrove
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Export growth - are there boroughs with spare houses/St Albans is part of Dacorum too?
Include files	
Number	Question 37
ID	LPIO4400
Full Name	Mr Bruce Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	St Albans should take some of the growth due to the East Hemel development option. A new settlement may be the best answer as the infrastructure can be built from scratch. Strongly agree with not using Green Belt before Brownfield.
Include files	
Number	Question 37
ID	LPIO4427
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Excepting that brownfield sites only should be considered. Hemel is a good example of what will happen if green belt is infringed. Bovingdon Airfield is a discussion to be had.
Include files	
Number	Question 37
ID	LPIO4493
Full Name	Mrs Alison Williamson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Development should be focussed away from the villages . Hemel Hempstead was built as a new town and has better infrastructure than some of the villages, although would still need much improvement. The development

	at Shendish should NOT be considered as part of the Hemel Hempstead plan as it is, in fact, part of Kings Langley and would lead to the coalescence of Kings Langley and Hemel Hempstead.
Include files	
Number	Question 37
ID	LPIO4535
Full Name	Mr Robert Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	1. NO should not be rejected. Good idea to consider a new settlement
Include files	
Number	Question 37
ID	LPIO4595
Full Name	Mrs Margaret Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO4625
Full Name	Mr John Lunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The focus should be on continuing to expand Hemel Hempstead as there is still the most scope there to improve the town structure by well planned higher density development. Other locations such as Berkhamsted and Kings Langley are at capacity apart from a few remaining small sites. I also like the idea of a joint development with St Albans to the east of HH

Include files	
Number	Question 37
ID	LPIO4669
Full Name	Ms Ann Davies
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan.
Include files	
Number	Question 37
ID	LPIO4671
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Growth should be focused on the 3 main towns - Hemel, Tring and Berkhamsted.
Include files	
Number	Question 37
ID	LPIO4767
Full Name	Mr Keith Bradbury
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The failure of St Albans to engage with DBC is regrettable.
Include files	
Number	Question 37
ID	LPIO4796
Full Name	Mrs Joanna Brown
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Could use the St Albans land east of Hemel. Berkhamsted has seen massive growth .hemel much less. Must not build on greenfield site.
Include files	
Number	Question 37
ID	LPIO4872
Full Name	
Company / Organisation	Watson Howick
Position	
Agent Name	Mrs Julia Riddle
Company / Organisation	Castle Planning
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The rejected patterns of distribution of growth are agreed. They do not represent the most sustainable or efficient means of delivering growth and therefore those chosen for further consideration are preferable and cover the more suitable options in this regard.
Include files	
Number	Question 37
ID	LPIO4916
Full Name	Mrs Shirley White
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Liaison with another Council area should be considered, specifically with regards to the St Albans land east of Hemel. If St Albans are allowed to develop the land shown as Gorhambury on the maps then this will have a significant effect on Hemel. Co-operation with St Albans is a key issue.
Include files	
Number	Question 37
ID	LPIO4972
Full Name	Mr Michael Arrowsmith
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Export growth to St Albans should be more fully explored as should a new settlement on Bovingdon airfield.
Include files	
Number	Question 37
ID	LPIO5032
Full Name	Mrs Nicola Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO5044
Full Name	Mr Chris Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	(i) Export to another Council area should not be rejected, specifically in relation to the St Albans land east of Hemel (Gorhambury). (ii) Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – (a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Albans' land east of Hemel as appropriate land for outward expansion of Hemel, with a large portion of the dwellings justly counting towards DBC's numbers. Although DBC have been unsuccessful in trying to engage with St Albans, that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated, this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation.

	<p>A full contribution towards Dacorum Housing target from Gorhambury development should be included in this plan.</p> <p>(iii) I agree strongly with rejecting "Use greenfield land before brownfield land" - but this consultation document suggests that DBC has not done that</p>
Include files	
Number	Question 37
ID	LPIO5099
Full Name	Dr Oliver Pengelley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	All of these options deserve further consideration, as part of a more balanced overall growth strategy. For example, some targeted rural development combined with some at large villages, in combination with Hemel expansion and some export of growth to areas with more brownfield, would do more to preserve the character of the Borough and meet the wishes of current residents.
Include files	
Number	Question 37
ID	LPIO5167
Full Name	Jameson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Strongly agree with rejecting "use of greenfield land before brownfield land" - these proposals as suggested do not reject this growth distribution. Co-operation with St Albans for development of land east of Hemel Hempstead (Gorhambury) should be included within the DBC plan. This was the key issue in the core strategy inspection.
Include files	
Number	Question 37
ID	LPIO5226
Full Name	Mr Gareth Morris
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO5284
Full Name	Mr Gary Ansell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes to all 5 points
Include files	
Number	Question 37
ID	LPIO5300
Full Name	Mrs Catherine Anderson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO5348
Full Name	Ilyn horne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I agree most of these means of distrusting growth should be rejected. However, with an exception: Working with the surrounding councils to export the growth to another council area. I believe more needs to be done to identify empty properties and properties owned by investors to force

	these into the number to be included as potential social/supported housing.
Include files	
Number	Question 37
ID	LPIO5381
Full Name	Dr Rachael Frost
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Firstly, these options seem designed to pit locations against each other, leading to no consensus and letting the council do what they want. Development should be spread fairly but also concentrated in areas where infrastructure can be developed. A new small village near a train line could work well, and passing development onto other councils is possible.</p>
Include files	
Number	Question 37
ID	LPIO5390
Full Name	MS Nicola Hutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I agree that there should plans to prevent developers from land banking. There should be a clear message that green belt land CANNOT be used for development. It is completely unacceptable for environmental reasons that Green belt land is developed where there are other more acceptable sites with potential for infrastructure available!!! If there is no possible;e of profitable development on precious green belt then Land banked sites would have to be used.</p> <p>I also agree with other comments about sites such as Bovingdon airfield being developed and greater consultation with St. Albans Council to ensure that a proportion of the development at Gorehambiury is counted towards Hemel hempsteads targets.</p> <p>Whilst I would agree that option 1A is the preferred option I would strongly highlight my objection to the proposed site of development of Green belt at Shendish Manor with proposed 900 houses and a primary school. This is green belt, there is no possible infrastructure available and it would mean a merging of Apsley and Hemel hempstead with Kings Langley. It would</p>

	completely destroy the character of the Rucklers Lane settlement and lead to pollution and unacceptable levels of traffic congestion with associated risks to health and safety.
Include files	
Number	Question 37
ID	LPIO5409
Full Name	Mr Reuben Bellamy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO5412
Full Name	Mr Reuben Bellamy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Using greenfield land before brownfield land is not a growth distribution but a phasing point. The distribution that focuses on the three towns will involve the use of both greenfield and brownfield land. When land comes forward, it should be tied to the infrastructure necessary to deliver it. No arbitrary 'brownfield first' policy, which is not supported by Government policy in the Framework, is justified.
Include files	
Number	Question 37
ID	LPIO5424
Full Name	Mr Pdraig Dowd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	This is a question which encompasses five separate questions so my response is in general terms.

Include files	
Number	Question 37
ID	LPIO5488
Full Name	Mr John Ingleby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	However it's not clear why Bovingdon Airfield could not be considered for a large new settlement
Include files	
Number	Question 37
ID	LPIO5509
Full Name	Mr Garrick Stevens
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Looking at each in turn</p> <p>1. New settlement (town or village)</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. Regret that the lack of regional strategic planning prevents this option being used regionally, but that should not preclude collaboration by the District and County Councils to develop appropriate scale 'towns' to be built to a master plan over decades perhaps.</p> <p>2. Rural growth.</p> <p>Yes.</p> <p>3. Export growth to another Council area.</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site. However, with residents migrating to areas with less costly housing, we are already exporting growth.</p> <p>1 Use greenfield land before brownfield land.</p> <p>Yes, agree strongly with rejecting this approach but this consultation document suggest that DBC is not doing that.</p> <p>5. Significant expansion of large villages.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the rural villages.</p>

Include files	
Number	Question 37
ID	LPIO5577
Full Name	
Company / Organisation	Village Foundations
Position	
Agent Name	Mr Nick Wyke
Company / Organisation	Gade Group
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Villages and the wider rural area should not be seen as inappropriate locations to accommodate future residential development. New housing of the right type and size not only helps residents to stay and grow in the village but also supports facilities and services that have suffered or even been lost as we witness the closure of the post office and shop and other facilities.</p> <p>Research shows that many of the arguments about new housing in villages being less sustainable are untrue. For example carbon emissions from commuters in towns and cities can be higher as those residents often create more emissions and have longer journey times due to the higher levels of traffic congestion and delays.</p> <p>It is possible today to buy a new home that generates renewable power and actually supplies the grid with excess energy. The battery powered cars are award winning and a genuine replacement vehicle for 95% of the population. With broadband and new ways of working, more people are working from home and or on flexible hours.</p> <p>So times have changed. Technology and demographics move on. Village Foundations calls for more realistic and helpful policies for rural areas and villages, in order to tackle real and pressing social and demographic issues.</p>
Include files	
Number	Question 37
ID	LPIO5602
Full Name	Mrs Christine Cosgrave
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	

Number	Question 37
ID	LPIO5671
Full Name	Mr Nigel Vanner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As a number of contributors have suggested the plan should not reject the possibility of a new settlement (town or village). Surely this is something that should be pursued by working with adjacent local authorities
Include files	
Number	Question 37
ID	LPIO5701
Full Name	Mr Alastair Greene
Company / Organisation	Little Gaddesden Parish Council
Position	Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO5759
Full Name	Dr Lucy Murfett
Company / Organisation	Chilterns Conservation Board
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Chilterns Conservation Board considers that given the high level of constraint and environmental capacity issues in Dacorum, the option of accommodating some growth in other less constrained Council areas should not be rejected. Some broader strategic planning and regional planning would help ensure that the nationally protected landscape of the Chilterns AONB is conserved and enhanced. The Oxford- Cambridge growth corridor with potentially one million additional homes will reshape the strategic geography of the region and could move the locus of growth northwards, which should take the pressure off land to the south during this plan period.

Include files	
Number	Question 37
ID	LPIO5782
Full Name	Mr Brian Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	apart from greenbelt over brown field none of these should be rejected
Include files	
Number	Question 37
ID	LPIO5817
Full Name	Mr Roy Farrant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Expanding current villages and towns puts extra pressure on them from the point of view of every single issue. Characters of villages will change; villages become subsumed into larger towns; infrastructure which is already creaking with the strain (due to financial pressures) will not be able to cope and the quality of life for existing and new residents and office workers reduces considerably. Appendix C of the plan explains why a new settlement is rejected. It suggests that "much of Dacorum is affected by sensitive landscapes". This is equally true of the plans to expand current settlements. Appendix C goes on to say that "Sites in excess of 3,000 new homes would be difficult to deliver in the new Local Plan period. It is not explained why this is felt to be any more difficult than spreading that number of homes around several locations. On the contrary, in terms of upheaval to existing residents, it would be very much more beneficial to have all the building work going on in one, new settlement location. The Appendix then says a new settlement is rejected because "We do not consider that there are any suitable sites in sustainable locations". This is absolute nonsense. One only has to travel the A41 to see acres and acres of available land far away from existing settlements. In conclusion, Appendix C is a simple whitewash, without any sensible consideration being even attempted.
Include files	

Number	Question 37
ID	LPIO5908
Full Name	Mr Michael Lelieveld
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We support the response put forward by Berkhamsted Town Council for this question (being Q37.1 = Y, 37.2 = Y, 37.3 = N, 37.4 = Y, but... 37.5 = Y).
Include files	
Number	Question 37
ID	LPIO5941
Full Name	Mr Grahame Partridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly , (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
Include files	
Number	Question 37
ID	LPIO6057
Full Name	Georgina Tregoning
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO6103
Full Name	Dr Gerwyn Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I believe more effort should be invested by Dacorum in tandem with neighbouring councils, if necessary, to explore the development of a new settlement. It is very clear from the many comments posted that the towns and villages in this area are all suffering a level of congestion well beyond their design capacities. There is also a fundamental flaw in the planning process if we are unable to include proposals for a new settlement on the grounds that the settlement would not be delivered by 2036.
Include files	
Number	Question 37
ID	LPIO6115
Full Name	Mr Andrew Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A new settlement is a far more practical suggestion
Include files	
Number	Question 37
ID	LPIO6137
Full Name	mr graham dore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why not consider a new town? Eg Bovingdon airfield is a large site that could support facilities and infrastructure required for a significant development.
Include files	
Number	Question 37
ID	LPIO6145
Full Name	Mrs Rosemary North
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Hemel Hempstead has the space and infrastructure for expansion.
Include files	
Number	Question 37
ID	LPIO6194
Full Name	Mrs Helen Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	With the various infrastructure issues within all of the current locations within Dacorum, more consideration should be given to a small new town.
Include files	
Number	Question 37
ID	LPIO6207
Full Name	Steve Pitts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	All of those are preferable to any significant development on the Green Belt. A new town would make sense from an infrastructure point of view but it is difficult to think of a suitable site in the borough, SW Herts, or indeed Hertfordshire as a whole.

Include files	
Number	Question 37
ID	LPIO6222
Full Name	Mr Colin Tate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I agree with the rejection of growth distributions 1, 2, 4 and 5, but think it is premature to reject "Export growth to another Council area".</p> <p>Welwyn Hatfield has asked Dacorum to help meet its housing need (see Appendix B, "Above upper Government figure" Option).</p> <p>It doesn't appear to have been finally established that there is no scope for Dacorum to seek assistance from other Councils before devastating the Green Belt on the outskirts of towns and villages in Dacorum in perpetuity.</p> <p>I note from Appendix C: Reasons for rejecting alternative growth distributions: Export a substantial level of growth to another Council area that "Discussions about housing growth are ongoing with the other Councils in South West Hertfordshire and our approach (and any agreement) is being documented in a Memorandum of Understanding or potentially a Statement of Common Ground".</p>
Include files	
Number	Question 37
ID	LPIO6372
Full Name	Miss Lucy Muzio
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No why should hemel take the brunt of all the land loss spread it over adjoining towns
Include files	
Number	Question 37
ID	LPIO6473
Full Name	Mrs Kristina Neville
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Greenfield should be protected, brownfield should be used. Villages should be respected and heritage protected.
Include files	
Number	Question 37
ID	LPIO6491
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A new settlement should not be rejected. Para. 9.0.8. states 'Larger-scale growth can make infrastructure delivery easier as new facilities and services can be directly provided on these new sites, or through more sizeable financial contributions. Export growth to St Albans must be kept on the table.
Include files	
Number	Question 37
ID	LPIO6508
Full Name	Mr Topan Dutta
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO6524
Full Name	Mrs anna silsby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But to be clear: significant expansion of a large village should be quantified. Significant should be defined as no more than 5%; and provided the local infrastructure is upgraded before any development takes place.
Include files	
Number	Question 37
ID	LPIO6625
Full Name	Mr Alan Horn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Rejecting the growth distributions listed is the only sensible option. a) New settlement (town or village); b) Rural growth; c) Export growth to another Council area; d) Use greenfield land before brownfield land; and e) Significant expansion of a large village(s)
Include files	
Number	Question 37
ID	LPIO6647
Full Name	Ms C Oxer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	If such a large number of new homes is required, the best way of achieving this with a good quality, sustainable result is to build a new town. If this takes a little longer, but the end result is vastly better than squeezing in houses in bad places, then so be it - the council should be able to justify this to central government. Take the long-term view.
Include files	
Number	Question 37
ID	LPIO6682
Full Name	Miss Giulietta Cinque
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>It does appear that these questions are worded in such a way that might be seen as tricking the reader into selecting the opposite yes/no than they intended!</p> <p>It is noted that the council have already stated that they reject 'significant expansion of a large village(s)'. Given this is the case DBC should remove proposals to build on Green Belt.</p>
Include files	
Number	Question 37
ID	LPIO6723
Full Name	Mr Nick Hollinghurst
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO6792
Full Name	Mr Andrew Lambourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would support the exploration of the development of a coherent new settlement - Bovingdon has been mentioned.</p> <p>Definitely support rejecting the use of greenfield in favour of brownfield, and proactive pursuit of sites like Bovingdon.</p>
Include files	
Number	Question 37
ID	LPIO6800
Full Name	Mr Geoff Latham
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	All options should be considered.
Include files	
Number	Question 37
ID	LPIO6847
Full Name	Mr Nicholas Ring
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO6900
Full Name	Helen Cole
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I would much rather seen new towns and villages, with infrastructure specifically designed for the residents than the spread and destruction of the character of our existing ones.
Include files	
Number	Question 37
ID	LPIO7027
Full Name	mr michael hicks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	the constraints of the AONB and green belt means option c should be explored.

	<p>Transport limitations caused by the huge new developments like Aylesbury and Leighton buzzard plus the oxford Milton keynes Cambridge arc and others mean that there is no place for a new settlement.</p> <p>small amounts of rural growth under the rural exemption should be allowed to revitalise the small villages.</p>
Include files	
Number	Question 37
ID	LPIO7064
Full Name	Mrs Gillian Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q. 36 to 45 No</p> <p>It seems that Berkhamsted has contributed housing for the current Core Strategy over and above the required amount and that other areas have not developed at the same rate. This does not seem to have been taken into account in preparing this consultation. <u>Berkhamsted</u> feels as if it is <u>bursting</u> with all the development currently underway and planned. The schools are pretty full, the Doctors are overworked, air pollution exceeds EU regulations, traffic at rush hours is dreadful, playing fields and playgrounds are very busy.</p> <p>Of all the options put forward the only one I feel would be acceptable is Option 1B.</p>
Include files	
Number	Question 37
ID	LPIO7065
Full Name	Mrs Gillian Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q. 36 to 45 No</p> <p>It seems that Berkhamsted has contributed housing for the current Core Strategy over and above the required amount and that other areas have not developed at the same rate. This does not seem to have been taken into account in preparing this consultation. <u>Berkhamsted</u> feels as if it is <u>bursting</u> with all the development currently underway and planned. The schools are pretty full, the Doctors are overworked, air pollution exceeds EU</p>

	<p>regulations, traffic at rush hours is dreadful, playing fields and playgrounds are very busy.</p> <p>Of all the options put forward the only one I feel would be acceptable is Option 1B.</p>
Include files	
Number	Question 37
ID	LPIO7077
Full Name	Mr & Mrs Charlotte and David Vesey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Alternatively a new town properly planned with proper infrastructure and room for expansion would surely be a better alternative.
Include files	
Number	Question 37
ID	LPIO7127
Full Name	Mr & Mrs Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current</p>

Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG RESPONSE TO Q37 - FULL DOC ATTACHED TO Q46

Question 37

Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?

No

Export to another Council area should not be rejected, specifically the St Albans land east of Hemel

Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and

more

significantly

, (c) the role that effective co-operation with local authorities could play in meeting any housing needs

	<p>arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation</p> <p>. Contribution towards Dacorum</p> <p>Housing target from Gorhambury development should be included in this plan</p> <p><input type="checkbox"/></p> <p>Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that</p>
Include files	
Number	Question 37
ID	LPIO7244
Full Name	Penny Clifton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>There seems to be no strategic overview of the entire situation - instead this is a reactive plan to housing needs. Hemel Hempstead was designed as a 'city in a park' in response to the 1940's demands for new housing. I feel strongly that our planning system should be doing the same again now - in other words, it should be identifying an area where a new town can be built and where the proper infrastructure can be provided. Milton Keynes is a perfect example. The piecemeal development of this plan, and an increase in housing stock imposed on already overstretched and crowded towns is unsustainable and poorly planned. It is particularly unfair on smaller towns like Berkhamsted</p>
Include files	
Number	Question 37
ID	LPIO7338
Full Name	Brian and Heidi Norris
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We fully understand the need for additional housing in this country, but it should not be to the detriment of towns such as ours. We do not intend to reply to the 46 questions one by one, but support the answers given by the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group and support Option 1B in the Strategy Plan. Even this number of 600 further homes is, in our view, more than enough, but we understand that is an existing commitment.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37</p> <p><i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel</p> <p><input type="checkbox"/></p> <p>Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and</p> <p>more</p> <p>significantly</p> <p>, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of</p> <p>Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be</p> <p>allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part</p> <p>of the partial review but DBC have simply 'parked' the issue for this consultation</p> <p>. Contribution towards Dacorum</p> <p>Housing target from Gorhambury development should be included in this plan</p> <p><input type="checkbox"/></p>

	Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO7377
Full Name	Mrs Helen Harding
Company / Organisation	Chiltern & South Bucks District Council
Position	Principal Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Thank you for consulting Chiltern and South Bucks District Council and for your continuing engagement on Duty to Co-operate matters with the Councils in relation to the emerging Dacorum Plan and the joint Local Plan Chiltern and South Bucks.</p> <p>I attach the response of Chiltern and South Bucks District Council on your reg 18 Issues and Options consultation. The response has been agreed with the Chiltern District Council Portfolio Holder for Sustainable Development, Councillor Peter Martin.</p> <p>The response of the South Bucks District Council Portfolio Holder for Sustainable Development, Councillor John Read is currently awaited at the time of sending this email. If there are any changes to this response in the light of comments which he may wish to make I will contact you straight away.</p> <p>37 - Rejection of alternative growth distributions</p> <p>This refers to the rejection of options to export growth to another Council area (q 37 .3) and the rejection of significant expansion of a large village (q 37.5) which are not reasonable options in relation to the particularly constrained characteristics of nearby Chiltern and South Bucks and in relation to Bovingdon. The stance of Dacorum BC on this is supported</p> <p>FULL DOC ATTACHED TO Q46</p>
Include files	
Number	Question 37
ID	LPIO7431
Full Name	Christine McGinty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why has Bovingdon Airfield not been considered? This is a brown field site and preferable to building on the green belt. Just because land owners have offered their land to the council, does this make it right to build on green belt?
Include files	
Number	Question 37
ID	LPIO7481
Full Name	MR Christopher Kendall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Export growth to another Council area Answer – NO. See answer to Question 2 – as follows. [The South West Hertfordshire area studied by G L Hearn is an arbitrary division. There has been and continues to be very substantial housing growth in Aylesbury much of which is now taking place to the east of that town towards Tring. In identifying the need for affordable housing in Tring {or Berkhamsted for that matter} it is far more logical to consider the situation in Aylesbury Vale district which has, in this respect, far more relevance to Tring than a lot of towns in South West Hertfordshire – e.g. Watford. Very substantial housing development has taken place recently around Aylesbury and much more is planned. Huge housing and infrastructure developments are taking place to the east of the town {i.e. towards Tring} with 2450 new homes in Broughton and 3000 in Weston Turville. A substantial proportion of this housing is designated affordable. These developments seriously question the need for any large scale Green Belt housing in Tring. It is well known that house prices in closer proximity to London increase substantially – and by the same token housing in developing towns such as Aylesbury or Milton Keynes is far more available and affordable. This outward migration has not been properly taken into effect in the assessment of needs.]
Include files	
Number	Question 37
ID	LPIO7613
Full Name	Mr Simon McKee
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1 a) <i>New settlement (town or village)</i> yes</p> <p>2 b) <i>Rural growth</i>; it should only where appropriate and in moderation.</p> <p>c) <i>Export growth to another Council area</i>; if that area has capacity and more appropriate sites then this should be considered</p> <p>d) <i>Use greenfield land before brownfield land</i> yes; and</p> <p>e) <i>Significant expansion of a large village(s)</i> no when this conflicts with the fundamental principles of Green Belt Policy.</p>
Include files	
Number	Question 37
ID	LPIO7656
Full Name	MR MICHAEL MCGINTY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why has Bovingdon Airfield not been considered? This is a brown field site and preferable to building on the green belt. Just because land owners have offered their land to the council, does this make it right to build on green belt?
Include files	
Number	Question 37
ID	LPIO7683
Full Name	JUNE LIGHTFOOT
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Questions 36 to 39</p> <p>No – see Question 40</p> <p>Question 40 Is Option 1B your preferred option for delivering the growth needs of the Borough?</p> <p>Yes.</p>

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.

Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more options for growth distribution.

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.

Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town's historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

Central Government's policy on Green Belt is clear: “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning, June 2016), and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 37
ID	LPIO7698
Full Name	MR & MRS MP & ME HARNETT
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<i>No. Further expansion to the north of Hemel Hempstead should be considered</i>
Include files	
Number	Question 37
ID	LPIO7744
Full Name	Mr Kevin Wilks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Subject to planning and land owners consent, (or through a compulsory purchase order), there is a possibility of being able to create a by-pass from the A41 at Bourne End which could then potentially join up with Bovingdon Airfield which I believe is a brownfield site. I think this needs to be put in place before any additional housing is added.</p> <p>I also think that Dacorum council should go back to the Government and ask them to put in a ruling to consider compulsory purchase to build out on brownfield sites or other sites with agreed planning that has not yet been built out before forcing councils to consider building on protected green belt.</p> <p>If a compulsory purchase order was put in place to deal with this country wide housing crisis, then the county could then consider sites such as Bovingdon Airfield in association with a by pass from the A41 at Bourne End. This would be a far better option for the village than the ones that are being put on offer.</p>
Include files	
Number	Question 37
ID	LPIO7752
Full Name	Mrs Anita Wilks
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Subject to planning and land owners consent, (or through a compulsory purchase order), these is a possibility of being able to create a by pass from the A41 at Bourne End which could then potentially join up with Bovingdon Airfield which I believe is a brownfield site. I think this needs to be put in place before any additional housing is added.</p> <p>I also think that Dacorum council should go back to the Government and ask them to put in a ruling to consider compulsory purchase to build out on brownfield sites or other sites with agreed planning that has not yet been built out before forcing councils to consider building on protected green belt.</p> <p>If a compulsory purchase order was put in place to deal with this country wide housing crisis, then the county could then consider site such as Bovingdon Airfield in associating with a by pass from the A41 at Bourne End. This would be a far better option for the village than the ones that are being put on offer.</p>
Include files	
Number	Question 37
ID	LP107924
Full Name	Dr Peter Chapman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LP107963
Full Name	Mr Norman Groves
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

<p>Your response - Please add your response here</p>	<p>I would like to confirm that I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG RESPONSE TO Q37</p> <p><input type="checkbox"/></p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel</p> <p><input type="checkbox"/></p> <p>Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector' report requested a partial review containing three elements –“a) household projections; (b) the role and function of Green Belt...and more significantly , (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum” Throughout the public sessions the Inspector consistently pointed to St Alban' land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC' numbers. DBC have tried to engage with St Albans but that council' refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “ignificant”part of the partial review but DBC have simply 'arked'the issue for this consultation . Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <p><input type="checkbox"/></p> <p>Agree strongly with rejecting “se greenfield land before brownfield land”but this consultation document suggest that DBC have not done that</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 37</p>
<p>ID</p>	<p>LPIO8012</p>
<p>Full Name</p>	<p>Mr Michael Nidd</p>
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Agent Name</p>	
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Your Opinion - Please state your opinion here</p>	<p>No</p>
<p>Your response - Please add your response here</p>	<p>There should have been thorough exploration of the potential for exporting to another Council area, including the notional export involving the St Albans land east of</p>

	Hemel Hempstead. Co-operation with St Albans was key issue in Core Strategy Inspection. The principle of rejecting a policy involving use of greenfield land before brownfield land is welcome but there is insufficient evidence in the draft Plan that DBC has seriously adopted it.
Include files	
Number	Question 37
ID	LPIO8069
Full Name	Hertsmere Borough Council
Company / Organisation	Hertsmere Borough Council
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q.37 – Rejected growth distributions - no</p> <p>Your rejection of a new settlement as an option for meeting any growth needs during the Plan period is noted. With regard to the reasoning set out in appendix C however, we would make two comments. Firstly, we would question the assumption that a new settlement could not deliver sufficient homes required in the Plan period (to 2036); whilst delivery during the early years of the Plan period would be unlikely, homes could start to be delivered later in the period and would thus contribute significantly to the meeting of housing need. Secondly, whilst there has been initial agreement to undertake joint work on strategic planning policies in line with emerging Government policy (ref. the recent POS workshop hosted by Dacorum) it is considered premature at this stage to state that this work will consider potential locations/sites for new garden settlements; such a commission has not been agreed between authorities.</p>
Include files	
Number	Question 37
ID	LPIO8208
Full Name	Mr Keith Ward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I urge you to consider carefully before proceeding further. I recognise that growth is inevitable but do not believe that all options have been properly considered, that errors have been made and that a number of major factors have been disregarded.</p>

Include files	
Number	Question 37
ID	LPIO8273
Full Name	Mr Phil Hodgson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Far better to design and build a separate new town for say 10,000+ with services and facilities that are sufficient for the need.
Include files	
Number	Question 37
ID	LPIO8309
Full Name	MR JAMIE and Jude GRAY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Our conclusion is that Hemel Hempstead is much more suitable for expansion but ideally, new towns should be the solution.
Include files	
Number	Question 37
ID	LPIO8396
Full Name	Helen & Stuart Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action group have responded in full to the issues and options consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation the we wish DBC to duplicate BRAG's responses under our name. However, we would like to take this opportunity to emphasize just a few of the most important points within that response

How can a brownfield site be overlooked in favour of a greenfield site? Surely it is time to build a completely new garden town rather than consistently adding to existing locations until they cease to function. Schools/doctors etc can be planned from the outset.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LP108462
Full Name	Mr Peter Shell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Because of the above I am not in a position to myself provide detailed answers to all the questions, but have seen the response prepared by BRAG and agree with their comments which should also be regarded as my own.

	<p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LP108474
Full Name	Mrs Pat Berkley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG’s responses under my/our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years</p>

should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO8502
Full Name	Mr Lawrence Sutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

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

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Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel

	<ul style="list-style-type: none"> Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO8513
Full Name	Mrs Sarah Rees
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured</p>

promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried

	<p>to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO8521
Full Name	Spencer Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when</p>

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- Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO8680
Full Name	MRS G RUSSELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No 1- Development should be concentrated in Hemel Hempstead, which has brownfield and other land available, has the infrastructure, etc. 2- Bovingdon Airfield should perhaps be considered for development.
Include files	
Number	Question 37
ID	LPIO8712
Full Name	MR NIGEL EGERTON-KING
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I agree that brownfield sites should be developed before greenfield sites but this does not appear to have been reflected in the Council's proposals. I'm against unnecessary development in the Green Belt which is there for good reason.
Include files	
Number	Question 37
ID	LPIO8776
Full Name	gregory lee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	New settlement - Yes Use of greenfield land before brownfield - No Significant expansion of a large village(s) - No

	More housing in Kings Langley would further cripple an already creaking infrastructure and set of amenities (schools, doctor surgeries, road network, etc). The ongoing safety of our children would simply be compromised far beyond the level that we would have ever expected when we decided to reside in the area. Growing into the green belt would impact the quality of life for so many and the wildlife (of Shendish for example) would be lost forever.
Include files	
Number	Question 37
ID	LPIO8883
Full Name	mrs susan stier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Q37- NO_ Cooperation with St Albans is key to delivering more housing for Dacorum Brownfield sites should always be used before greenfield.
Include files	
Number	Question 37
ID	LPIO8964
Full Name	barney greenwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No – see Question 40 q40 Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted. Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but

clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.

Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

Central Government's policy on Green Belt is clear: "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning, June 2016), and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes

Include files	
Number	Question 37
ID	LP109044
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. Co-operation with St Albans was key issue in Core Strategy Inspection
Include files	
Number	Question 37
ID	LPIO9057
Full Name	David Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. Co-operation with St Albans was key issue in Core Strategy Inspection.
Include files	
Number	Question 37
ID	LPIO9169
Full Name	S Langley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different

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Include files	
Number	Question 37
ID	LPIO9478
Full Name	TRICIA KENNEDY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am of the view that a new town should be built in a geographical area that allows roads to be built, a new station, new schools and houses of all prices to be provided with all the necessary services. The building project Aylesbury Berryfields is to be admired.
Include files	
Number	Question 37
ID	LPIO9782
Full Name	Aly MacLean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt</p>

boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO9830
Full Name	Mr Paul Wardle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’

consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.

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Include files	
Number	Question 37
ID	LPIO10005
Full Name	mr Kevin Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive

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Include files	
Number	Question 37
ID	LPIO10053
Full Name	Jill Mewha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.</p>

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Include files	
Number	Question 37
ID	LPIO10122
Full Name	Melanie Frankel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different</p>

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BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan

	<ul style="list-style-type: none"> Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10170
Full Name	Natalie Crane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character</p>

and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO10227
Full Name	Mr Tim Beeby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted</p>

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BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO10274
Full Name	John and Jane Beeley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.

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

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

developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO10324
Full Name	Kathleen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am writing in response to the latest plan for housing development in Berkhamsted, most of which suggests an excessive and impractical number of new houses. I

	<p>have read your Local Plan 2017 and I have read the reply of Berkhamsted Residents' Action Group (BRAG) and agree that <u>Option 1B is the only option acceptable</u>.</p> <p>I agree entirely with the BRAG response to your plan.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10373
Full Name	J&P Savage
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Secondly, the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would

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

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

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

	<p>Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10438
Full Name	Mr Daniel Parry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to</p>

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

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	<p>to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10487
Full Name	David Burbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, <u>I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name</u></p> <p><u>However, I would like to take this opportunity emphasize just a few of the most important points within that response</u></p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when</p>

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- Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that

Include files

Number	Question 37
ID	LPIO10537
Full Name	Mr Stephen Doughty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>I would however like to make a few specific comments.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10585
Full Name	Mr Roger Petts
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LP1010632
Full Name	Simon Chilton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p>

	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10682
Full Name	Sally and David Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please register as support for BRAG's submission.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector

	<p>consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10730
Full Name	Mrs Jenny Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Five year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC has carried out a simple arithmetic exercise and</p>

restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted has exceeded by 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognised when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be very detrimental, given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times,

including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high seems to be a function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LP1010764
Full Name	Taylor Wimpy Strategic Land
Company / Organisation	Taylor Wimpy Strategic Land
Position	C/O Pegasus Group
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	For full response please see question 46.
Include files	
Number	Question 37
ID	LPIO10782
Full Name	Mrs J Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Possibly we should be more open to rural growth and significant expansions of larger villages and market towns
Include files	
Number	Question 37
ID	LPIO10824
Full Name	Grant Imlah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Moreover i am aware that The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more</p>

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

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in

	<p>meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10876
Full Name	Sheila Dawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have studied the above plan, accessed the BRAG website, and attended the Berkhamsted Citizens Association Visioning Evening on 15 November and the Berkhamsted Town Council presentation on 22 November.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a</p>

massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact

	<p>detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO10924
Full Name	Jean Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Hemel Hempstead developments are 21% below the target figure. This shortfall should be taken into account in the new plans when assessing development numbers and site options.</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the</p>

	<p>commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p>
Include files	
Number	Question 37
ID	LPIO10974
Full Name	Christopher Stafford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from</p>

failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion

	<p>of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO11024
Full Name	Mrs Patti Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead,</p>

Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO11071
Full Name	J M Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Hemel Hempstead developments are 21% below the target figure. This shortfall should be taken into account in the new plans when assessing development numbers and site options.</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under</p>

	Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.
Include files	
Number	Question 37
ID	LPIO11103
Full Name	Denis Maclure
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>see [preferred option] Question 40 (below)</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already</p>

	<p>planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>Central Government’s policy on Green Belt is clear: “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning, June 2016), and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>
Include files	
Number	Question 37
ID	LPIO11151
Full Name	Cally Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards

	<p>Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO11198
Full Name	Mr Neil Aitchison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Mainly Hemel Hempstead with” garden villages” attached.
Include files	
Number	Question 37
ID	LPIO11246
Full Name	Jon Rollit
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the</p>

options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in

	<p>meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO11295
Full Name	Kate Locke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In addition I would reiterate the extensive points made in the BRAG response to the 'Issues & Options' consultation. I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. The Berkhamsted Residents Action Group (BRAG) has responded in full.</p> <p>In addition, I like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel</p>

developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

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Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

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- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan

	<ul style="list-style-type: none"> Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO11330
Full Name	David Greenwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	However, any increase in housing from 360-435 unit in Bovington would constitute a ‘significant expansion of a large village’.
Include files	
Number	Question 37
ID	LPIO11384
Full Name	Ms Lorraine Gilmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>BRAG has responded in full to the ‘Issues & Options’ consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish Dacorum Borough Council (DBC) to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasise some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for</p>

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

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO11434
Full Name	Conian
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include</p>

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

BRAG response to Question 37 (please note full document is attached to Q46)

Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in

	<p>meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO11494
Full Name	Mr Alan Ledger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I agree that brownfield sites should be developed before greenfield sites but this does not appear to have been reflected in the Council's proposals. I'm against unnecessary development in the Green Belt which is there for good reason
Include files	
Number	Question 37
ID	LPIO11540
Full Name	Ms Eliza Hermann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Question 37</p> <p>Do you agree with the rejection of the following growth distributions:</p> <ol style="list-style-type: none"> 1 New settlement (town or village); 2 Rural growth; 3 Export growth to another Council area; 4 Use greenfield land before brownfield land; and 5 Significant expansion of a large village(s)

specifically...

c.) Export growth to another Council area - no I disagree with the rejection of this growth distribution, as stated in my response to Q2 and repeated here for convenience -

Dacorum should assume that 50% of the proposed 2500 housing units at "East Hemel" will count towards meeting Dacorum's own housing need. Dacorum should also similarly factor in a percentage of recent and planned developments in nearby Buckinghamshire and Bedfordshire.

Specifically, Dacorum must achieve fair and equitable resolution with St Albans District over the proportion of housing to be developed at "East Hemel" that will count towards Dacorum's housing need. This development is an expansion of the Hemel Hempstead urban area and is not contiguous with any settlement or built-up area in St Albans District. This issue was of central importance in the Planning Inspector's report on the Core Strategy and it remains so today. While resolution of this issue is still pending, Dacorum Borough Council should make an assumption that 50% of the proposed 2500 housing units at "East Hemel" will count towards Dacorum's housing need, and factor that number in to the new Local Plan. Future updates to the Local Plan can then adjust the number, if necessary, once resolution is achieved.

The consultation document lacks evidence of engagement with neighbouring local authorities in Buckinghamshire and Bedfordshire. Given large scale developments in those areas e.g. Berryfields and Weedon Hill at Aylesbury and growth and regeneration at Dunstable, and their consequent environmental and infrastructure impact on Dacorum, a portion of this housing should also be recognised as meeting some of Dacorum's housing need.

a.) New settlement (town or village) - yes I agree with the rejection of this growth distribution, because there is no available location in the borough for a new development of that scale.

b.) Rural growth - yes I agree with the rejection of this growth distribution, except that limited rural growth is possible through brownfield redevelopment and regeneration and should be pursued.

d.) Use greenfield land before brownfield land - yes I agree with the rejection of this growth distribution.

e.) Significant expansion of a large village/s - yes I agree with the rejection of this growth distribution, unless the local people of a particular village choose to expand in this way.

Include files	
Number	Question 37
ID	LPIO11622
Full Name	Janet and James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report,</p>

development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

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Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO11776
Full Name	Edmund Hobley
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy, Berkhamsted has exceeded targets for the rate of development by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit</p>

margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Brag Response to question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO11816
Full Name	John Thomson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	If and when housing growth becomes higher than option 1 (602 pa) the new settlement/separate rural growth idea has to be front runner, despite the challenges
Include files	
Number	Question 37
ID	LPIO11926

Full Name	Janet Mason
Company / Organisation	Berkhamsted Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>1.New settlement (town or village)</i></p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p><i>2.Rural growth.</i></p> <p>Yes.</p> <p>1 <i>Export growth to another Council area.</i></p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p><i>4.Use Greenfield land before Brownfield land</i></p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC is not doing that.</p> <p><i>5.Significant expansion of large villages</i></p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages. This will enhance the viability and sustainability of village centres.</p>
Include files	
Number	Question 37
ID	LPIO11972
Full Name	Dee Sells
Company / Organisation	Markyate Parish Council
Position	Parish Clerk/ RFO
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	The Markyate Parish Council has made its comments earlier in the consultation. We do not believe that any new housing should be considered until the water supply issue is resolved. We do not believe Markyate is appropriate for any further building save to meet local needs.
Include files	
Number	Question 37
ID	LPIO11988
Full Name	Mark Behrendt
Company / Organisation	Home Builders Federation
Position	Planning Manager – Local Plans
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Housing Delivery Until the Council are clear as to the level of housing need they will have to try and meet we would not suggest ruling out any potential delivery options. To reject the options set out in paragraph 10.3.3 at this stage is premature and could leave the Council in a position where it needs to use a rejected option. We would therefore suggest that all the potential options are left available, and that the most appropriate option for meeting needs is taken forward once those needs are finalised. The NPPF sets out the need for local planning authorities to be creative in seeking to meet the development needs of their areas and the approach taken by the Council will limit their ability to provide creative solutions to the problems they face.
Include files	
Number	Question 37
ID	LPIO12074
Full Name	David Wilyman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

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

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

Standard BRAG response to Question 37. Please note full document is attached to Question 46

	<p>Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12111
Full Name	Colin Blundel
Company / Organisation	Chiltern Society
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>In view of the large area of Green Belt and AONB within Dacorum, we consider that the Council should not rule out exporting growth to other Council areas. This issue needs to be considered on a more regionalised basis if true protection is to be afforded to the Green Belt and AONB. It will require several Housing Market Areas to</p>

	<p>be considered together and for Councils to co-operate through their Statements of Common Ground.</p> <p>In relation to the Chilterns AONB, the constituent local authorities are signed up to the Chilterns Conservation Board and the AONB Management Plan. There is therefore a history of authorities working together to protect this nationally designated area. For the full benefits of AONB and Green Belt to be retained this co-ordinated approach is essential.</p>
Include files	
Number	Question 37
ID	LP1012170
Full Name	Ray Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing</p>

distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

Standard BRAG response to Question 37. Please note full document is attached to Q46.

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files

Number	Question 37
ID	LPIO12189
Full Name	Ms Julie Hollway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I believe a better Local Plan would be to build a whole "new town" in the area - away from current towns and villages - than spoil the beautiful, well respected, historic river valley settlement of Berkhamsted. The new town could be built from the bottom up with the appropriate infrastructure (schools, clinics, public open spaces, transport, parking, shops, businesses) ... and the necessary housing to support the Local Plan. I understand plans for one is currently being developed and so this should form part of the number of homes requested and consideration within the Local Plan.
Include files	
Number	Question 37
ID	LPIO12229
Full Name	Douglas & Christina Billington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any</p>

improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

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	<p>the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12308
Full Name	Richard Frankel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first</p> <p>10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it</p>

can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June

2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LP1012375

Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO12399
Full Name	ms rona morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	St Albans should take some of the growth due to the East Hemel development option. A new settlement may be the best answer as the infrastructure can be built from scratch. Strongly agree with not using Green Belt before Brownfield.
Include files	
Number	Question 37
ID	LPIO12452
Full Name	Judy Halden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas</p>

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

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

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Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

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- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – “(a) household projections; (b) the role

	<p>and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12500
Full Name	Meenakshi Jefferys
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel</p>

has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards

	<p>Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12547
Full Name	Mrs Jane Barrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's</p>

infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted. RAG response for Question x. Please note full document is attached to Question 46.

Standard BRAG response for Question 37. Please note full document is attached to Question 46.

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO12597
Full Name	mr paul healy

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent</p>

budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO12647
Full Name	Merrick Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this as

confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

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

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

	<p>Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12695
Full Name	Monika & Casper Gibilaro
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under our name</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.</p>

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BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of

	<p>Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12743
Full Name	Lorna Ginn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed</p>

at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. **Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.**

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of

	<p>Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12792
Full Name	Mr Raymond Phipps
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards

	<p>Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12839
Full Name	Ingrid Carola McKenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but it seems clear that DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most</p>

suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.

The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. Beyond short term financial profit developers have no interest in the wellbeing of the town, the local council and its residents. Once having built and taken their profit developers leave the residents and local council to deal with the fallout.

Such demand from developers is Absolutely the Wrong reason to focus even more development on Berkhamsted.

Further, under Government policy it cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal

	<p>to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12887
Full Name	Mr Stephen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan

	<ul style="list-style-type: none"> Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO12941
Full Name	Jon Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report,</p>

development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO12990
Full Name	Edward Keane
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albansland east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Heme developments. Such disparities within Dacorum must be taken into account when assessing development number and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit</p>

margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO13039
Full Name	Bettina Deuse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.

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

BRAG response to question 37 below (full BRAG response see question 46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report

	<p>requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13092
Full Name	Mr Paul Tinworth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum’s Local Plan.</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion

	<p>of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13140
Full Name	Hilary Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure</p>

constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37

ID	LPIO13198
Full Name	Mr J G Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Growth should be exported to another council area if it has to.
Include files	
Number	Question 37
ID	LPIO13268
Full Name	D. Phillips
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully concur with the comments attached from BRAG. The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicated that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, 'within urban capacity'. Export to another Council area should not be rejected, specifically the St Albans land East of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements to infrastructure. In contrast, Hemel has developed at a rate of 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from a failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel</p>

Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the planning inspector stated in his Core Strategy report, development in Berkhamsted 'has to be balanced against the need to protect the town's historic character and setting' and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear - 'demand for housing alone will not change Green Belt boundaries' (letter to MPs from Minister of State for Housing and Planning - June 2016) - and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan

	<ul style="list-style-type: none"> Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13474
Full Name	Mrs Catherine Imber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>We don’t understand why a new settlement town/village has been rejected</p> <p>Export to another Council area should not be rejected, specifically the Gorhambury land.</p> <p>Agree no rural growth Agree rejection of significant expansion of small villages Agree rejection of greenfield land before brownfield land</p> <p>We feel it is important not to ruin the character of the market towns</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> Export to another Council area should not be rejected, specifically the St Albans land east of Hemel Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of

	<p>Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13522
Full Name	Deborah Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure</p>

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Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

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- Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO13577
Full Name	Mr Alan O'Neill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted.</p> <p>Of the options put forward, <u>Option 1B is the only one that would be acceptable for Berkhamsted.</u></p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective

	<p>co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13630
Full Name	Sue O'Neill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who</p>

	<p>generate the highest profit margins building in Berkhamsted.</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13692
Full Name	Tim Uden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under my name.

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

Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

	<p>Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13757
Full Name	Edward Hatley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that, to support the 5 year housing land supply, will require Green Belt releases immediately. Obviously, a 5 year housing land supply needs to be properly identified but the</p>

consultation document indicates that DBC have ill-conceived ideas of how to do this.

The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.

There are many more permutations for growth distribution, but DBC appear to have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.

Over the first 10 years of the current Core Strategy, Berkhamsted has **exceeded** the target by a massive 34% without any improvements in infrastructure. The problems with parking (which the proposed ill-conceived multi-storey car park will not solve), insufficient medical facilities and the impact on our schools are just a few of the areas that need addressing.

In contrast, Hemel has developed at a rate some 21% **below** the target figure. The entire shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options.

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs that should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful.

Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. The Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”. The excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.

The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

	<p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13808
Full Name	Mr Roger Didham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more</p>

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

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal

	<p>to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO13863
Full Name	Alex Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the</p>

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BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
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	<p>of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO14032
Full Name	Danny Jennings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum's Local Plan.</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked'

	<p>the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO14081
Full Name	Mr John Goffey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response to the DBC <i>Issues and Options</i> document. We would, in addition, like to add the following points concerning Question 33 of the above document.</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards

	<p>Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO14129
Full Name	Sue Elleray
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for</p>

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- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files

Number

Question 37

ID	LPIO14180
Full Name	Mr Richard White
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO14325
Full Name	Ms Vicky Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as do confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B</p>

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Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO14363
Full Name	Mr Humphreys
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO14409
Full Name	Ray Tattle
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a</p>

reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO14458
Full Name	Giselle Okin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.

	<p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO14507
Full Name	Mr David Griffin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</i></p> <p><i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i></p>

Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town's historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?

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	<ul style="list-style-type: none"> Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO14689
Full Name	Ann Bunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO14709
Full Name	mr ron perkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO14719

Full Name	Mrs Jean Perkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO14784
Full Name	Ms Paula Farnham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues & Options' consultation. I could make similar comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity to emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when</p>

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Include files	
Number	Question 37
ID	LPIO14816
Full Name	Steve Baker
Company / Organisation	CPRE - The Hertfordshire Society
Position	Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Yes a, b, d, e</p> <p>No c</p> <p>Rather than using the words in c) "Export growth", the Council should take into account all national constraints on meeting the needs of the Borough to grow such as the Chilterns Area of Outstanding Natural Beauty and Green Belt and consider that these needs may have to be met elsewhere.</p> <p>Bullet c) should be removed from the list of rejected options for growth distribution, re-worded and included in the list of locational principles in paragraph 10.2.4.</p>
Include files	
Number	Question 37
ID	LPIO14856
Full Name	Bev Mckenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording,</p>

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The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted.

Beyond short term financial profit developers have no interest in the wellbeing of the town, the local council and its residents.

Once having built and taken their profit developers leave the residents and local council to deal with the fallout.

Such demand from developers is Absolutely the Wrong reason to focus even more development on Berkhamsted.

Further, under Government policy it cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

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Include files	
Number	Question 37
ID	LPIO14902
Full Name	Mr Michael Curry
Company / Organisation	Tring Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>Option (c) should be explored because of the constraints the Green Belt and Chilterns A.O.N.B. places on Dacorum's ability to take further growth.</p> <p>With regard to the option of a new settlement, the suggestion that this is looked at on a county basis is noted. This could be linked with the announcements of development of the Oxford/Milton Keynes/Cambridge arc with development within the Royston–Baldock–Buntingford triangle. The area north of Tring mentioned is already surrounded by development in Aylesbury and Leighton Buzzard which will put the poor communication links under even greater pressure.</p>
Include files	
Number	Question 37
ID	LPIO14914
Full Name	Mr Garrick Stevens
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>3. Export growth to another Council area.</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site. However, with residents migrating to areas with less costly housing, we are already exporting growth.</p>
Include files	
Number	Question 37
ID	LPIO14959
Full Name	Malcolm and Jill Allen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p>

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

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	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15009
Full Name	Mr Clive Freestone
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another</p>

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

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

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Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

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	<p>co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15057
Full Name	Mr & Mrs D A Simmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. We request you accept this summary as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>We would like to take this opportunity to emphasize a few of the most important points within that response, <i>in particular our response to Q25.</i></p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel</p>

developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards

	<p>Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15154
Full Name	Mr David Broadley
Company / Organisation	Aylesbury Vale District Council
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Issue 28 - What are the Growth options?</p> <p>p.97 – Distribution Options – Why are there only three distribution options and is there a reason a new settlement (significant expansion of a single major settlement other than Hemel Hempstead) has not been considered?</p>
Include files	
Number	Question 37
ID	LPIO15182
Full Name	Bert Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>Answer – NO.</p> <p>See answer to Question 2 (below)</p> <p>Question 2 – Have we reflected all cross boundary issues or issues of particular importance to you or your organisation?</p> <p>Answer – NO.</p> <p>The South West Hertfordshire area studied by G L Hearn is an arbitrary division. There has been and continues to be very substantial housing growth in Aylesbury much of which is now taking place to the east of that town towards Tring.</p> <p>In identifying the need for affordable housing in Tring {or Berkhamsted for that matter} it is far more logical to consider the situation in Aylesbury Vale district which has, in this respect, far more relevance to Tring than a</p>

	<p>lot of towns in South West Hertfordshire – e.g. Watford. Very substantial housing development has taken place recently around Aylesbury and much more is planned. Huge housing and infrastructure developments are taking place to the east of the town {i.e. towards Tring} with 2450 new homes in Broughton and 3000 in Weston Turville. A substantial proportion of this housing is designated affordable. These developments seriously question the need for any large scale Green Belt housing in Tring.</p> <p>It is well known that house prices in closer proximity to London increase substantially – and by the same token housing in developing towns such as Aylesbury, Milton Keynes or Luton is far more available and affordable. This outward migration has not been properly taken into effect in the assessment of needs.</p>
Include files	
Number	Question 37
ID	LPIO15202
Full Name	Valerie Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>Answer – NO.</p> <p>See answer to Question 2 (below)</p> <p>Question 2 – Have we reflected all cross boundary issues or issues of particular importance to you or your organisation?</p> <p>Answer – NO.</p> <p>The South West Hertfordshire area studied by G L Hearn is an arbitrary division. There has been and continues to be very substantial housing growth in Aylesbury much of which is now taking place to the east of that town towards Tring.</p> <p>In identifying the need for affordable housing in Tring {or Berkhamsted for that matter} it is far more logical to consider the situation in Aylesbury Vale district which has, in this respect, far more relevance to Tring than a lot of towns in South West Hertfordshire – e.g. Watford. Very substantial housing development has taken place recently around Aylesbury and much more is planned. Huge housing and infrastructure developments are taking place to the east of the town {i.e. towards Tring} with 2450 new homes in Broughton and 3000 in Weston Turville. A substantial proportion of this housing is designated affordable. These developments seriously question the need for any large scale Green Belt housing in Tring.</p>

	It is well known that house prices in closer proximity to London increase substantially – and by the same token housing in developing towns such as Aylesbury, Milton Keynes or Luton is far more available and affordable. This outward migration has not been properly taken into effect in the assessment of needs.
Include files	
Number	Question 37
ID	LPIO15226
Full Name	Sue Tiley
Company / Organisation	Welwyn Hatfield Borough Council
Position	Planning Policy and Implementation Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We note that Dacorum considers that a new settlement would need to involve a minimum of 5,000 dwellings in order to secure sufficient infrastructure for a new settlement to be self-supporting. The option of accommodating growth through the delivery of a new settlement on such as scale has been rejected at this stage, noting that a large part of the borough is affected by sensitive landscapes (e.g. the Chilterns Area of Outstanding Natural Beauty), other areas are considered to have poor communication links and to date, no site of such a scale has been promoted to Dacorum.</p> <p>Welwyn Hatfield would emphasise that it may be possible to deliver a sustainable new settlement on a much smaller scale, (i.e. a village), that accommodates 1000+ dwellings (the minimum size for a two-form entry primary school). On this basis, Dacorum may need to reconsider this as an option as part of exploring all reasonable alternative alternatives for accommodating growth against the full OAHN (And taking into account any shortfalls it has been requested to consider from other areas).</p> <p>We would like to make you aware that WHBC have signed a MOUs with a number of neighbouring authorities within our HMA agreeing to investigate the potential to deliver a new garden town or village(s) for meeting the longer term needs.</p>
Include files	
Number	Question 37
ID	LPIO15286
Full Name	Caroline Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37: Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LP1015336
Full Name	Mr Alan Conway
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues & Options Consultation.</p> <p>I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q33 to Q45 I support the BRAG submission. Yet again the failure to provide an accurate base from which to proceed renders much of what follows suspect and in many parts misleading.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15385
Full Name	Sue Wolstenholme
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p>Standard BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15447
Full Name	Nick Hanling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation

and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.

I would like to take this opportunity emphasize some of the most important points within that response.

Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this.

The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.

Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise.

Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

	<p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LP1015495
Full Name	Sarah and Nigel Tester
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p>

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

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel

	<ul style="list-style-type: none"> Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15552
Full Name	Miss Tanya Assarat
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG's responses under my name.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> Export to another Council area should not be rejected, specifically the St Albans land east of Hemel Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective

	<p>co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15601
Full Name	Melanie Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p>The restrictions on housing in the villages are often illogical and could be amended to help meet the housing targets. For instance in Potten End there is a site on Hempstead Lane near Chestnut Close which had one very small bungalow on a large plot. I understand that the present regulations restrict redevelopment. Its nonsensical. I have not surveyed the plot but I think it could take 3 good sized houses with adequate gardens. the use of land within villages or where there has been a dwelling previously should be used to the maximum extent provided it is in keeping. However, in all other respects I oppose enlargement on the edge of the villages which would encroach on the Green Belt and destroy their character just as the plans you have put forward would destroy Berkhamsted's.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p>

	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15667
Full Name	Mr James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report

	<p>requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15726
Full Name	Mark Pawlett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO15774

Full Name	Maria & Colin Sturges
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage</p>
Include files	
Number	Question 37
ID	LPIO15821
Full Name	David Kerrigan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p>No – see Question 40</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p>

	<p>Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</p> <p>No</p> <ul style="list-style-type: none"> Export to another Council area should not be rejected, specifically the St Albans land east of Hemel Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO15879
Full Name	D B Land and Planning
Company / Organisation	D B Land and Planning
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> In rejecting the growth options specified in the question, DBLP has the following comments: Rural Growth – it is not clear what is meant by “rural growth” does this mean directing development to large village locations as part of a balanced approach, or is it more specific in terms of directing the bulk of the Borough’s development needs into the rural area as a whole Use greenfield land before brownfield land – in conjunction with other answers, there is the concern that the Plan as emerging is seeking to promote a brownfield first strategy which has implications for the supply of housing and the timing and phasing of green field sites. This will

	<p>be to the detriment of housing supply in the borough. As a result, DBLP is keen to see parity between greenfield and brownfield sites, so that both can come forward at the same time and the delivery of housing from each does not compromise the other</p> <ul style="list-style-type: none"> • Significant expansion of a larger village – Markyate is a larger village and there is a need for the Plan to be more explicit as to what constitutes “significant” as this is a matter of individual perception
Include files	
Number	Question 37
ID	LPIO15927
Full Name	James Pitt
Company / Organisation	Gleeson Developments Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes, we agree that the alternative options listed are inappropriate and correctly rejected, in some cases on the grounds of lack of sustainability, and in some cases on the grounds of lack of deliverability/certainty that housing needs will be met.
Include files	
Number	Question 37
ID	LPIO15988
Full Name	Mr Robert Sellwood
Company / Organisation	The Crown Estate
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>It is considered that the Council is correct in rejecting these growth options for the following reasons :</p> <p>1. New Settlement : Given the constraints on available land in Dacorum, it is considered that a new settlement is not a reasonable option</p> <ul style="list-style-type: none"> 1 Rural Growth : This would not be a sustainable option and would conflict with the principles in the NPPF 1 Export growth to another Council area : This would not be socially or economically desirable and would conflict with the Duty to Co-operate

	<ul style="list-style-type: none"> 1 Use greenfield before brownfield : This would not be a sensible approach to the existing resource of brownfield land 1 Significant expansion of large villages: This option would lead to existing small communities being overwhelmed by major development
Include files	
Number	Question 37
ID	LPIO16078
Full Name	Dave Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ul style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO16133
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p>

	<p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO16192
Full Name	Stuart Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO16249
Full Name	Stuart Mears
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</p> <p>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO16310
Full Name	Kitty Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>please find the attached report written on mine and other residents request.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO16372
Full Name	Aaron Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I support GFRA responses see below.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO16420
Full Name	Ruth and Stephen Wright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must</p>

be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards

	<p>Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO16485
Full Name	Andrew Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO16561
Full Name	Ian Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p>

	<p>No</p> <ul style="list-style-type: none"> . Export to another Council area should not be rejected, specifically the St Albans land east of Hemel . Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan . Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO16696
Full Name	Katie Parsons
Company / Organisation	Historic England
Position	Historic Environment Planning Advisor
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We do not have a preference for any growth option at present until further information and analysis has been carried with regards to potential heritage impacts. However, we are keen to ensure that growth and development conserves and enhances the significance of the Borough’s many heritage assets.</p> <p>We are pleased to see that the cumulative impacts deriving from the potential development at Gorhambury</p>

	in the neighbouring authority of St Albans City and District is being considered as part of the growth options appraisal process. A good understanding of the cumulative impacts of development is an important part of understanding the wider impacts upon the historic environment.
Include files	
Number	Question 37
ID	LPIO16727
Full Name	Lynsey Hillman-Gamble
Company / Organisation	Central Bedfordshire Council
Position	Strategic Plan Partnership Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Issue 28 – The sites identified to deliver potential growth are considered to be well distributed across the Borough. CBC would expect to be consulted upon any specific proposals taken forward at Markyate given the proximity of the settlement to Central Bedfordshire.
Include files	
Number	Question 37
ID	LPIO16750
Full Name	Martin Ephgrave
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We do not agree that it is appropriate to reject the use of greenfield land before brownfield land for a number of reasons, as follows:</p> <ul style="list-style-type: none"> • This approach would prevent <u>all</u> development on greenfield land if brownfield sites existed • It ignores the fact that brownfield sites can have constraints that make them difficult to develop, including viability issues • Not all brownfield sites are in sustainable locations and may not be well served by appropriate infrastructure etc. • It is simply not possible for the council to deliver the number of homes that are required to meet future needs, without developing greenfield sites • We agree that the council should seek to deliver development on brownfield land where possible, but should not seek to hold back much needed new development on greenfield sites.

Include files	
Number	Question 37
ID	LPIO16844
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO16912
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified</p>

	within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.
Include files	
Number	Question 37
ID	LPIO17000
Full Name	Chris Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17057
Full Name	Jade Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village

	We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.
Include files	
Number	Question 37
ID	LPIO17114
Full Name	Grahame Senior
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17249
Full Name	Debbie Crooks Pam Moss
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p>

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

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO17305
Full Name	Margaret and Andrew Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three

	<p>elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO17361
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>...</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17413
Full Name	Lesley Brown

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 37 below (copy of full response attached to question 46)</p> <p>Question 37</p> <p><i>Do you agree with the rejection of the following growth distributions:</i></p> <p>No</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural growth.</p> <p>Yes.</p> <p>3. Export growth to another Council</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO17468
Full Name	Sara Bell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it

	<p>necessary to re-send the report with my own comments on the matter.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17527
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>...</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17575
Full Name	MR DAVID BROWN
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 37 below (copy of full response attached to question 46)</p> <p>Question 37</p> <p><i>Do you agree with the rejection of the following growth distributions:</i></p> <p>No</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural growth.</p> <p>Yes.</p> <p>3. Export growth to another Council</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO17634
Full Name	Paul Hembury
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning & Development details my concerns comprehensively.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area

	<p>4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village</p> <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17662
Full Name	Guinness Partnership
Company / Organisation	Guinness Partnership
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1 A new settlement on a railway line may need to be considered in due course</p> <p>2 Some rural growth should be considered in order to maintain existing settlements and keep local facilities such as schools and shops viable</p> <p>3 DBC should accommodate its own growth</p> <p>4 There is very little brownfield land to be used and the greenfield releases are essential to accommodate 25,000 houses over the next 25 years</p> <p>5 Significant expansion of Markyate should be actively considered</p>
Include files	
Number	Question 37
ID	LPIO17708
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</p> <p>GFRA Response to Question 37, full document attached to question 46</p>

	<ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17757
Full Name	Diana Woodward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express.</p> <p>BCA response to Question 37 below - full document attached to Question 46</p> <p><i>Do you agree with the rejection of the following growth distributions:</i></p> <p>No</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural growth.</p> <p>Yes.</p> <p>1 <i>Export growth to another Council</i></p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO17813

Full Name	John and Helen Osborne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17871
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>

Include files	
Number	Question 37
ID	LPIO17929
Full Name	Dave Davies
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO17977
Full Name	Mr Michael Burbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 37
ID	LPIO18038
Full Name	mr Richard Lambert
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMENT), my own views can be summarised in a handful of bullet point.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO18109
Full Name	Mr Graham Bright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37

ID	LPIO18166
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO18223
Full Name	Nicky and Dave Hulse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>

Include files	
Number	Question 37
ID	LPIO18277
Full Name	Gail Skelton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the</p>

commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO18336
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO18363
Full Name	Plato Property Investments LLP
Company / Organisation	Plato Property Investments LLP
Position	C/O Aitchison Rafferty
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This Statement has been prepared to respond to the questions set out in the Issues and Options Consultation published by the Council in November 2017. It is submitted on behalf of Plato Property investments LLP in respect of a site located to the south east of the Mini dealership at London Road, Cow Roast HP23 5RE.</p> <p>This Statement should be read along with the Planning Statement attached at Appendix 1 (see Q 46 for attachment) which sets out the detailed planning case in support of the allocation of the site for housing in the emerging Local Plan.</p> <p>In summary, we consider that:</p> <p>We do not agree that it is appropriate to reject the use of greenfield land before brownfield land for a number of reasons, as follows:</p> <ul style="list-style-type: none"> • This approach would prevent <u>all</u> development on greenfield land if brownfield sites • It ignores the fact that brownfield sites can have constraints that make them difficult to develop, including viability • Not all brownfield sites are in sustainable locations and may not be well served by appropriate infrastructure

	<ul style="list-style-type: none"> • Conversely, some green field sites such as Cow Roast, are not high quality agricultural land but are well served by infrastructure and are sustainable for contributing to housing , • It is simply not possible for the council to deliver the number of homes that are required to meet future needs, without developing greenfield sites • We agree that the council should seek to deliver development on brownfield land where possible, but should not seek to hold back much needed new development on greenfield sites.
Include files	
Number	Question 37
ID	LPIO18466
Full Name	Mrs Wendy Mclean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In the main. But I do not agree to the rejection of a New town or village. At some point this has got to be given serious consideration so why not address it now
Include files	
Number	Question 37
ID	LPIO18504
Full Name	Melanine Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector

	<p>consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO18551
Full Name	Mrs Juliet Chodzko
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part

	<p>of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO18597
Full Name	Captain Andrew Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	

Number	Question 37
ID	LPIO18643
Full Name	Lindy Weinreb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Do you agree with the rejection of the following growth distributions:</i></p> <p>No</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural growth.</p> <p>Yes.</p> <p>3. Export growth to another Council</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO18690
Full Name	Hilary Abbott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town's historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO18736
Full Name	Paul and Gillian Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously, 5 year housing land supply needs to be located but the consultation document indicates that DBC has ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.</p>

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

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in

	<p>meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO18782
Full Name	Berkhamsted Citizens
Company / Organisation	Berkhamsted Citizens
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Do you agree with the rejection of the following growth distributions:</i></p> <p>No</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural growth.</p> <p>Yes.</p> <p>3. Export growth to another Council</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO18831
Full Name	Lyndsay Slater

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent</p>

budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO18878
Full Name	Andrew and Margit Dobbie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive

points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

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

BRAG response to Question 37 (please note full document is attached to Q46)

	<p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO18924
Full Name	Katherine Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>...</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel

	<ul style="list-style-type: none"> Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO18948
Full Name	Rupert Symmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We consider that there may be some merit in considering a new settlement to the north of the borough and also a limited amount of rural development.
Include files	
Number	Question 37
ID	LPIO19002
Full Name	Mrs Emma Robertson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please find attached the final report written on behalf of Grove Field Residents Association.It states what we believe to be the best case scenario for Tring

	<p>with the proposed increase to the town. Please read and include the report findings in your final decision.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19065
Full Name	Barbara Gainsley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>I attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</i></p> <p><i>Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.</i></p> <p><i>Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.</i></p> <ol style="list-style-type: none"> 1 New settlement (town or village) <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>Rural growth.</p> <p>Yes.</p> <p>Export growth to another Council area.</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>4 Use greenfield land before brownfield land.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p>

	<p>1 Significant expansion of large villages.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO19122
Full Name	Bill Ahearn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to register my objections to some of the proposals under consideration on the grounds they are simply to excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19180
Full Name	Ms Sarah Hain
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p>

	<p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19238
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19295
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Our family (4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town’s infrastructure. We feel strongly that green belt land should be preserved for future generations</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19349
Full Name	Stuart, Miranda & Melissa Kay
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban</p>

capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective

	<p>co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO19399
Full Name	Wai Tang and Greg Barfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please note we are aware that the Berkhamsted Residents Action Group (BRAG) has responded in full to the "Issues & Options" consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.</p> <p>We wish to add our concerns to the DBC local plan issues and options consultation.</p> <p>We are particularly concerned about the following</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account</p>

when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning "June 2016") and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 37 (please note full document is attached to Q46)

Question 37 *Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?*

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that

Include files	
Number	Question 37
ID	LPIO19445
Full Name	Philippa Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan.</p> <p>Question 37 <i>Do you agree with the rejection of the following growth distributions:</i></p> <p>No</p> <p>1 <i>New settlement (town or village)</i></p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>1 <i>Rural growth.</i></p> <p>Yes.</p> <p>1 <i>Export growth to another Council area.</i></p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>1 <i>Use greenfield land before brownfield land.</i></p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>1 <i>Significant expansion of large villages.</i></p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO19500
Full Name	John Wignall
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19557
Full Name	Kevin Cullen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please refer to the attached report.(BRAG)</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19615
Full Name	Mark Lawson and Sharon Wilkie

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19671
Full Name	Vivienne Inmonger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village

	We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.
Include files	
Number	Question 37
ID	LPIO19730
Full Name	John Inmonger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19784
Full Name	Ben Barth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p>Question 37</p>

	<p>Do you agree with the rejection of the following growth distributions:</p> <p>No</p> <p>1 New settlement (town or village)</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>1 Rural growth.</p> <p>Yes.</p> <p>1 Export growth to another Council area.</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>1 Use greenfield land before brownfield land.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>1 Significant expansion of large villages.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO19853
Full Name	Jon Esson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <p>1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village</p> <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from</p>

	another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.
Include files	
Number	Question 37
ID	LPIO19937
Full Name	Chris Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA)</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO19994
Full Name	mrs sue van rhee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village)

	<p>2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village</p> <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20051
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <p>1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village</p> <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20108
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>We are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20166
Full Name	Sherry and Haydn Bond
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20223
Full Name	Dianne Pilkington
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20271
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p>

	<p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO20326
Full Name	David Clarke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe that the proportion of houses that can be considered to be responsible allocation within</p>

	<p>Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20384
Full Name	Deborah Turnbull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20432
Full Name	Jane Collis
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LP1020493
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am writing in response to the Issues and Options consultation.

	<p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20541
Full Name	DR Brigitta Case
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the Berkhamsted Citizens’ Association and the Berkhamsted Residents Action Group. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p>

	<p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that <p>Berkhamsted Citizens response</p> <p><i>Do you agree with the rejection of the following growth distributions:</i></p> <p>No</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural growth.</p> <p>Yes.</p> <p>1 <i>Export growth to another Council</i></p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum’s total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO20588
Full Name	Christine Manning
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><i>Do you agree with the rejection of the following growth distributions:</i></p> <p>No</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural growth.</p> <p>Yes.</p> <p>3. Export growth to another Council</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC are not doing that.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages to support their viability.</p>
Include files	
Number	Question 37
ID	LPIO20660
Full Name	Jane Hawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village

	We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.
Include files	
Number	Question 37
ID	LPIO20716
Full Name	Keiron Wybrow
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO20764
Full Name	Christopher Townsend
Company / Organisation	
Position	Councillor, Tring Town Council
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)

	<p>Option (c) should be explored because of the constraints the Green Belt and Chilterns A.O.N.B. places on Dacorum's ability to take further growth.</p> <p>With regard to the option of a new settlement, the suggestion that this is looked at on a county basis is noted. This could be linked with the announcements of development of the Oxford/Milton Keynes/Cambridge arc with development within the Royston–Baldock–Buntingford triangle. The area north of Tring mentioned is already surrounded by development in Aylesbury and Leighton Buzzard which will put the poor communication links under even greater pressure.</p>
Include files	
Number	Question 37
ID	LPIO20812
Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ol style="list-style-type: none"> 1 New Settlement (town or village) Yes 2 Rural growth. No 3 Export growth to another Council area. No 4 Use Greenfield land before brownfield land. Yes 5 Significant expansion of large villages. Yes
Include files	
Number	Question 37
ID	LPIO20858
Full Name	Mr Iain Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p>

	<p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO20934
Full Name	Mr Jake Storey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I live in Berkhamsted and have witnessed the size of the small town growing in an unsustainable manner. As a result I joined SYBRA and also now BRAG. I have attached the BRAG response to your proposals</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p>

	<ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO20989
Full Name	Mr & Mrs J.D Battye
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents’ Action Group(BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG’s responses under our names so that a complete repetition of BRAG’s submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council’s submission.</p> <p>Q33 to Q38.BRAG.We fully support BRAG’s devastating analysis on what is the paramount issue before us.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p>

Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?

No

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

Berkhamsted Town Council response

Question 37 Do you agree with the rejection of the following growth distributions:

Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.

2. Rural growth.

Yes.

Export growth to another Council area.

No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum’s total as Dacorum will need to provide the facilities and much infrastructure for this site.

4. Use Greenfield land before Brownfield land.

Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC is not doing that.

Yes, but more scope could be given (albeit not major) for some further expansion of the villages. This will enhance the viability and sustainability of village centres.

Include files

Number

Question 37

ID	LPIO21074
Full Name	julie owen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO21139
Full Name	Sheron Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <ol style="list-style-type: none"> 1 New settlement (town or village) 2 Rural growth 3 Export growth to another Council area 4 Use greenfield land before brownfield land and; 5 Significant expansion of a large village <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	

Number	Question 37
ID	LPIO21168
Full Name	St Albans Diocesan Board of Finance
Company / Organisation	St Albans Diocesan Board of Finance
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>1.32 Question 37 and 38: Growth Distributions Q.37 Yes / Q.38 No</p> <ul style="list-style-type: none"> • SADBDF supports the distribution noted under A – Focus on the three towns. It is inevitable that Hemel Hempstead will provide a focus for growth through the plan period; however, SADBDF strongly endorse the location of significant levels of growth at the other two towns within the District. Berkhamsted and Tring are sustainable locations for development, with good road and public transport access and a range of facilities and services within the town, including opportunities for employment • The Plan does little to champion the benefits which growth can bring to a settlement. Development can deliver significant enhancements to infrastructure, such as highway improvements, increased school capacity and health care facilities, among other benefits, such as open space provision • SADBDF strong supports the distribution of growth to the three towns, and supports the comment within the Plan, where the impact on Green Belt can be dispersed • SADBDF does not agree that Hemel Hempstead should receive a greater focus of growth. It is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place. However, the disbursement of growth provides a far more sustainable pattern of development
Include files	
Number	Question 37
ID	LPIO21215
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>Question 37 Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</p> <p>No</p> <ul style="list-style-type: none"> Export to another Council area should not be rejected, specifically the St Albans land east of Hemel Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions I attended, the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan I agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that (e.g. 6.4.4). DBC should ensure that they are consistent throughout the plan in rejecting this option
Include files	
Number	Question 37
ID	LPIO21263
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be taken into account. I strongly support their submission (below)</p> <p>The Chilterns Conservation Board considers that given the high level of constraint and environmental capacity issues in Dacorum, the option of accommodating some growth in other less constrained Council areas should not be rejected. Some broader strategic planning and</p>

	regional planning would help ensure that the nationally protected landscape of the Chilterns AONB is conserved and enhanced. The Oxford- Cambridge growth corridor with potentially one million additional homes will reshape the strategic geography of the region and could move the locus of growth northwards, which should take the pressure off land to the south during this plan period.
Include files	
Number	Question 37
ID	LPIO21338
Full Name	Antony Harbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards

	<p>Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO21384
Full Name	Helen Kington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG’s response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards

	<p>Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO21427
Full Name	Mr R Smith and Mr A Lyell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1.32.1 The Landowners support the distribution noted under A – Focus on the three towns; it is inevitable that Hemel Hempstead will provide a focus for growth through the plan period; however, The Landowners strongly endorse the location of significant levels of growth at the other two towns within the District and the larger villages.</p> <p>1.32.2 The Plan does little to champion the benefits growth can bring to a settlement; development can deliver significant enhancements to infrastructure, such as highway improvements, increased school capacity and health care facilities, among other benefits, such as open space provision</p> <p>1.32.3 The Landowners strongly support proportionate distribution of growth to the three towns and other settlements, and support the comment within The Plan, that the impact on Green Belt should be dispersed rather than focussing development of Greenfield sites on a few very large allocations.</p> <p>1.32.4 The Landowners do not agree that Hemel Hempstead should receive a greater focus of growth; it is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place; however, the dispersal of growth provides a far more sustainable pattern of development.</p>
Include files	
Number	Question 37
ID	LPIO21501
Full Name	Hightown Housing Association
Company / Organisation	Hightown Housing Association
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 37 Do you agree with the rejection of the following growth distributions: No</p> <p>Yes. However, the sensible and controlled growth of a large village is supported to enable development to be delivered.</p>
Include files	
Number	Question 37
ID	LPIO21517
Full Name	Mr Chris Briggs
Company / Organisation	St Albans City & District Council
Position	Spatial Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q.37 Alternative growth distributions - No</p> <p><u>9. Settlement hierarchy and growth options (SA reasonable alternatives)</u></p> <p>SADC generally supports DBC's approach to distributing new development taking account of the existing settlement hierarchy. However, given the levels of growth across the 5 LPA HMA now being contemplated, this is not, on its own, a sufficient response. There should also be an explicit consideration of growth options that adjust the hierarchy, either by greater expansion of existing smaller settlements, or by creation of new settlements. These are certainly options and reasonable alternatives for the SA and should not be 'rejected' outside of the Plan process (Appendix C).</p> <p>It is also important to consider planned increases in urban capacity / regeneration and development beyond Green Belt options in detail (see 9. and 10. below).</p> <p>The approach taken appears inconsistent with the commitments arising from the Inspector's report on the Dacorum Core Strategy 2013 (extract para 29.10 below – emphasis added by SADC):</p> <p><i>Through the partial review, the Council will assess:</i></p> <p><i>a) household projections;</i></p> <p><i>b) the role and function of the Green Belt affecting Dacorum, including long term boundaries and the potential to identify safeguarded land beyond 2031; and more significantly,</i></p> <p><i>c) the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from This element will include St Albans district and relevant areas lying beyond the Green Belt.</i></p> <p><i>The outcome of the review cannot be prejudged.</i></p> <p>10. New settlement options (Section 10 / Appendices and SA).</p> <p>The DBC case for rejecting new settlements, large village expansions and rural growth is not accepted. SADC</p>

	<p>agrees that this issue needs to be considered 5 LPA HMA wide, or even beyond. Also it accepts that delivery timescales for some options may be long. However the Plan can and should set out a path for the longer term and this can be taken into account in setting Plan housing targets for the current Plan period. For DBC in particular, there are options that lie beyond the Green Belt (and AONB) and thus could better align with the NPPF:</p> <ul style="list-style-type: none"> - A new settlement. The area north west of Tring, beyond the Chilterns Area of Outstanding Natural Beauty (AONB) and the MGB - approximately 1,600 Ha within Dacorum - seems to have significant potential. As an illustrative example, if half of this area was used for a significant new settlement, it could accommodate approximately 15-20,000 dwellings and associated infrastructure (800 Ha * 60% residential * 40 dwellings per hectare = 19,200 dwellings) - Further expansion of Markyate <p>It is not understood why areas north west of Tring are considered to suffer from 'poor communications'. This location is strategically well placed to use existing rail access through stations on the West Coast Mainline (with potential additional capacity post HS2 and with future Cross Rail links). The A41 corridor main road routes and facilities / services provided by Aylesbury growth also assist. This area is well related to the Oxford / Cambridge growth area / infrastructure investment 'zone' beyond the Chilterns now being suggested by Government and relevant adjoining/nearby LPAs.</p>
Include files	
Number	Question 37
ID	LPIO21564
Full Name	Mrs Valerie Silverton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have read the proposals and strongly agree BRAG's responses.</p> <p>BRAG response to Question 37 (please note full document is attached to Q46)</p> <p>Question 37 <i>Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?</i></p> <p>No</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three

	<p>elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO21621
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum’s New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p>GFRA Response to Question 37, full document attached to question 46</p> <p>We agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area which has previously identified within this report has not been considered in sufficient detail in order to warrant its rejection at this stage.</p>
Include files	
Number	Question 37
ID	LPIO21668
Full Name	Mr John Monk

Company / Organisation	
Position	
Agent Name	Mr Nick Shute
Company / Organisation	Nick Shute Associates
Position	Planning and regeneration consultancy
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Response:</u></p> <p>The Issues and Options Report suggests that rural growth was rejected because it would not comply with Government planning guidance, or comply with the suggested Locational Principles. It would result in development being directed to the least sustainable parts of the Borough – many of which are protected by environmental and landscape designations. It would also fail to make use of some development locations on the edge of the three larger settlements, many of which are assessed in the initial assessment process to be suitable potential sites for growth.</p> <p>We agree that rural growth cannot accommodate a major component of the required growth. However, some rural growth could form part of a balanced strategy that spread development more evenly across the District.</p>
Include files	
Number	Question 37
ID	LPIO21694
Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • CPUK supports the distribution noted under A – Focus on the three towns; it is inevitable that Hemel Hempstead will provide a focus for growth through the plan period; however, CPUK strongly endorse the location of significant levels of growth at the other two towns within the District. Berkhamsted and Tring are sustainable locations for development, with good road and public transport access and a range of facilities and services within the town, including opportunities for employment. • The Plan does little to champion the benefits growth can bring to a settlement; development can deliver significant enhancements to infrastructure,

	<p>such as highway improvements, increased school capacity and health care facilities, among other benefits, such as open space provision.</p> <ul style="list-style-type: none"> • CPOK strong supports the distribution of growth to the three towns, and support the comment within The Plan, where the impact on Green Belt can be dispersed. • CPOK does not agree that Hemel Hempstead should receive a greater focus of growth; it is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place; however, the disbursement of growth provides a far more sustainable pattern of development.
Include files	
Number	Question 37
ID	LPIO21721
Full Name	Roger Saller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perceptiveness on what made the town attractive and what is now at risk.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead,</p>

Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that

Include files

Number

Question 37

ID	LPIO21833
Full Name	W Lamb Ltd
Company / Organisation	W Lamb Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • Yes, we agree with the rejection of the growth levels listed above for the reasons listed in Appendix C of the Issues and Options consultation document.
Include files	
Number	Question 37
ID	LPIO21904
Full Name	Louis Quail
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the augment for building on greenbelt land should only be one of last resort , there are plenty of other options left before launching off this one way route .</p> <p>Berkhamsted Residents Action Group response:</p> <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion

	<p>of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO21973
Full Name	Thomas and Margaret Ritchie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council's response:</p> <ol style="list-style-type: none"> 1. New settlement (town or village) Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally. 2. Rural growth Yes. 3. Export growth to another Council area No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site. 4. Use Greenfield land before Brownfield land Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC is not doing that. 5. Significant expansion of large villages Yes, but more scope could be given (albeit not major) for some further expansion of the villages. This will enhance the viability and sustainability of village centres.
Include files	
Number	Question 37
ID	LPIO21987

Full Name	Waterside Way
Company / Organisation	Waterside Way Sustainable Planning Ltd
Position	
Agent Name	Mr Stephen Harris
Company / Organisation	Emery Planning Partnership
Position	Senior Consultant
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> Therefore in answer to Q37 having a greater range of sites and developers across the 3 towns (Option A) will accord with paragraph 50 of the Framework in having a range of sites.
Include files	
Number	Question 37
ID	LPIO22050
Full Name	Gallagher Estates
Company / Organisation	Gallagher Estates
Position	
Agent Name	Mrs Hanna Staton
Company / Organisation	Pegasus Group
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>It is agreed that the three proposed main distributions for growth (focus on three towns; greater focus at Hemel Hempstead; and spread more evenly across the Borough) are the growth options with most merit and indeed consider a combination of all those options are appropriate to deliver the preferred dwelling requirement set out above.</p> <p>As set out within the Duty to Co-operate Paper (Appendix B), it has been identified that all neighbouring authorities are constrained by Green Belt and have limited capacity for additional growth. It is important that Dacorum Borough, therefore, looks to 'consume its own smoke' by accommodating the projected housing need within its own administrative boundaries.</p>
Include files	Appendix B - Stuart Wells Gallagher Estates -office BIR.4712_IssuesandOptionsReps_FINAL_131217 APPENDIX B.pdf
Number	Question 37
ID	LPIO22065
Full Name	MCJ Trust
Company / Organisation	MCJ Trust
Position	
Agent Name	Samuel

	Dix
Company / Organisation	Smith Jenkins
Position	Senior Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Our client does not agree with the proposed broad approach to distributing new development. They also do not agree with the outright rejection of any rural growth option.</p> <p>It is recognised that each growth option and the existing settlement hierarchy in the Borough is reflective of broader constraints that affect the area. However, the Issues and Options document and accompanying evidence has failed to give consideration to how different growth options could work partially or in tandem.</p> <p>For example, Appendix C to the consultation document explains that a rural growth option has been rejected due to it resulting in development being directed to the least sustainable parts of the Borough and failing to make use of locations on the edge of larger settlements. This indicates that rural growth has been considered as an option that is mutually exclusive of all others. In reality, rural growth should be viewed as complementing to those options that have been identified as preferred. It is clearly unrealistic that rural areas could accommodate the entirety of the Borough's objectively assessed need. However, allocating a wide range of small sites across rural settlements will provide a cumulative boost to housing supply without compromising the opportunities presented by development in larger settlements.</p> <p>Appendix C also dismisses growth in the rural areas as "not complying with Government planning guidance". This is a vague conclusion that overlooks the fact that the core planning principles in paragraph 17 of the NPPF include supporting thriving rural communities within the countryside. Paragraph 55 expands upon this and explains that sustainable development in rural areas should be promoted by directing housing to where it will enhance or maintain the vitality of rural communities, a matter that has been the subject of several other Government policy papers. No consideration has been given in the settlement hierarchy study or locational principles to how this could be achieved by development in the rural areas.</p> <p>We do not disagree with the methodology used in the settlement hierarchy study although do consider it is deficient in respect of smaller settlements. The study has simply carried forward existing designations without considering new reasonable alternatives. In this sense it has incorrectly been conducted in a 'policy-on' fashion. Paragraph 3.7.1 refers to smaller settlements as having a population of less than 300 and characterises them as 'hamlets' or 'isolated groups of homes'. This is not a sensible categorisation. Settlements like Flaunden are certainly not 'hamlets' or 'isolated groups of homes' even if their population is less than 300 (only just in the case of Flaunden). They are fully- formed villages that instead deserve to be considered and defined more precisely in the settlement hierarchy. It should be noted that there</p>

	<p>is no national definition of 'settlement' but a common sense approach would certainly use a much a lower population threshold than 300.</p> <p>Paragraph 3.7.1 of the settlement hierarchy study goes on to say that the reasons such places do not warrant 'settlement status' include not having cohesiveness that justifies a boundary; not containing enough key services and infrastructure; simply being ribbon development of adjoining settlements or; the need to protect their intrinsic character. Our client dispute each of these reasons as they relate to Flaunden and consider that it should at least be considered in the settlement hierarchy study. For example, the village already has a defined Conservation Area which means it is also cohesive enough for a settlement boundary. It has a pub, playing fields, village hall and church and is a distinct community in its own right that could nevertheless accommodate growth without adverse effects on its character. The recent decision in <i>Braintree District Council vs SSCLG</i> [Nov. 2017] confirms that the NPPF does not define the term 'isolated' and that rural housing may be granted permission where the site forms a logical extension to an existing village within the countryside.</p> <p>In summary, a dispersed strategy with a few homes allocated to each smaller settlement in the rural area would cumulatively assist with the delivery of higher growth options across the Borough and complement larger allocations elsewhere. The evidence has ignored the potential of the rural area by carrying forward existing policy constraints and overlooking the objectives of the NPPF in enhancing the vitality of such areas. For these reasons our client would advocate that the locational principles (that are open to scrutiny in question 36 of the consultation document) are amended to make specific reference to rural areas.</p>
Include files	
Number	Question 37
ID	LPIO22085
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>1. New settlement (town or village) Yes The identification of a new settlement would require significant land take in this constrained Borough which is unlikely to be deliverable.</p> <p>2. Rural Growth Yes</p>

	<p>A high priority should be given to protection of the rural areas within Dacorum being in the main, Green Belt, AONB, SAC and important for the setting of the historic environment.</p> <p>3. Export growth to another council area</p> <p>Yes</p> <p>However as set out earlier in these representations, there should be greater cross-boundary co- operation with allocations to the east of Kings Langley in Three Rivers and at Gorhambury, East Hemel in St Albans contributing towards the needs of Dacorum. This is based on the strong links of these areas with Kings Langley and Hemel Hempstead respectively.</p> <p>4. Use Greenfield land before brownfield land</p> <p>Yes</p> <p>The identification and allocation of brownfield land both within urban areas and previously developed land elsewhere should be prioritised over greenfield land. This fundamental principle reflects advice within the NPPF to make most efficient and effective use of available land, protection of the Green Belt and protection of the special character and constraints of the Borough.</p> <p>5. Significant expansion of a large village(s)</p> <p>Yes</p> <p>Option 1A: Growth should be focused on the three main towns of Hemel Hempstead, Tring and Berkhamsted.</p> <p><u>QUESTION 37 Growth Distributions - Summary Representation and Response Sought:</u> The KL&RA supports the rejection of all of the above growth distributions</p>
Include files	
Number	Question 37
ID	LPIO22106
Full Name	Crest Nicholson
Company / Organisation	
Position	
Agent Name	Sarah Moorhouse
Company / Organisation	Lichfields
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As set out in Section 3.0 of the Land at Blegberry Gardens, Berkhamsted (Site Be-h6) - Representations to Dacorum's New Local Plan: Issues and Options (Nov 2017) document by Lichfields on behalf of Crest Nicholson Chiltern, growth should be focused in and around the three main towns in the Borough.
Include files	Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Reprs (13.12.17).PDF
Number	Question 37

ID	LPIO22151
Full Name	Mrs Hayley Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	a) New Settlement (town or village) - No b) Rural Growth - Yes c) Export growth to another council area - No d) Use greenfield land before brownfield land - Yes e) Significant expansion of a large village(s) - Yes as it no longer qualifies (? unable to fully read hand writing)
Include files	
Number	Question 37
ID	LPIO22194
Full Name	Mr Peter Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	a) New Settlement (town or village) - No b) Rural Growth - Yes c) Export growth to another Council area - No d) Use greenfield land before brownfield land - Yes e) Significant expansion of a large village(s) - Yes as it no longer qualifies as a village if you grow too much
Include files	
Number	Question 37
ID	LPIO22239
Full Name	Miss Sophie Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	a) New settlement (town or village) - No b) Rural growth - Yes c) Export growth to another council area - No

	d) Use greenfield land before brownfield land - Yes e) Significant expansion of a large village(s) - Yes as if you grow it, it will no longer qualify as a village
Include files	
Number	Question 37
ID	LPIO22463
Full Name	Ashleigh Michnowiec
Company / Organisation	Harrow Estates plc
Position	
Agent Name	Mrs Sam Ryan
Company / Organisation	Turley Estates
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The three spatial options assessed in the Issues and Options consultation are the most appropriate for accommodating growth in Dacorum. Harrow Estates plc consider that a spatial pattern reflective of Option 2A, but subject to a higher overall housing requirement consistent with Option 3, represents the most appropriate solution for the borough (see also response to Q16, 39-46 and the accompanying Turley Local Needs Assessment)
Include files	
Number	Question 37
ID	LPIO22518
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please find below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below) <ul style="list-style-type: none"> • Export to another Council area should not be rejected, specifically the St Albans land east of Hemel • Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector's report requested a partial review containing three elements – "(a) household projections; (b) the role and function of Green Belt... and more significantly, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum". Throughout the public sessions the Inspector consistently pointed to St Alban's land east of

	<p>Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC's numbers. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most "significant" part of the partial review but DBC have simply 'parked' the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan</p> <ul style="list-style-type: none"> • Agree strongly with rejecting "Use greenfield land before brownfield land" but this consultation document suggest that DBC have not done that
Include files	
Number	Question 37
ID	LPIO22568
Full Name	Mrs C Longbottom
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support all answers and comments to the Issues & Options Consultation document noted on the Berkhamsted Town Council website</p> <p>Looking at each in turn</p> <p>1. New settlement (town or village0</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural Growth</p> <p>Yes</p> <p>3. Export growth to another Council area</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>4. Use Greenfield land before Brownfield land</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC is not doing that.</p> <p>5. Significant expansion of large villages</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages. This will enhance the viability and sustainability of village centres.</p>
Include files	
Number	Question 37
ID	LPIO22588

Full Name	Berkhamsted Schools Group
Company / Organisation	The Berkhamsted Schools Group
Position	
Agent Name	Kevin Rolfe
Company / Organisation	Aitchison Raffety
Position	Group Director, Development & Planning
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We do not agree that it is appropriate to reject the use of greenfield land before brownfield land for a number of reasons. The council's approach would prevent <u>all</u> development on greenfield land if brownfield sites existed. It ignores the fact that brownfield sites can have constraints that make them difficult to develop, including viability issues. Not all brownfield sites are in sustainable locations and may not be well served by appropriate infrastructure etc. Many brownfield sites are in key/established employment areas and are rightly protected from alternative uses. It is simply not possible for the council to deliver the number of homes that are required to meet future needs, without developing greenfield sites. We agree that the council should seek to deliver development on brownfield land where possible, but should certainly not hold back much needed new development on greenfield sites.
Include files	
Number	Question 37
ID	LPIO22638
Full Name	Mr & Mrs Mehew
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We write as residents of [REDACTED] [REDACTED] in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) (see comments LPIO18384, 18385) and the draft response prepared by Berkhamsted Town Council. Berkhamsted Town Council Response:

	<p>Looking at each in turn:</p> <p>1. New settlement (town or village)</p> <p>Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.</p> <p>2. Rural Growth</p> <p>Yes.</p> <p>3. Export growth to another Council area</p> <p>No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.</p> <p>4. Use Greenfield land before brownfield Land</p> <p>Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC is not doing that.</p> <p>5. Significant expansion of large villages.</p> <p>Yes, but more scope could be given (albeit not major) for some further expansion of the villages. This will enhance the viability and sustainability of village centres.</p>
Include files	
Number	Question 37
ID	LPIO22715
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 37 – Do you agree with the rejection of the following growth distributions: (1) New settlement (town or village); (2) Rural growth; (3) Export growth to another Council area; (4) Use greenfield land before brownfield land; (5) Significant expansion of a large village(s).</p> <p>1 <u>New settlement</u></p> <p>This can actually provide the opportunity to plan for sustainable modes from the outset and if large enough would have critical mass for services e.g. buses to be viable commercially. However this would require significant developer contributions to fund necessary infrastructure.</p> <p>1 <u>Rural growth</u></p> <p>Agree. These areas are likely to be least well served currently in relation to local services.</p>

	<p>1 <u>Export growth to another Council area</u> Growth that is well planned for can be beneficial if it leads to more sustainable communities.</p> <p>1 <u>Use greenfield land before brownfield land</u> Generally agree with rejection, but depends on site specifics as to how easy it is to make development at a particular site sustainable.</p> <p>1 <u>Significant expansion of large village</u> Agree. This is likely to need greater improvements to infrastructure. DBC has proposed three main distributions, based on the settlement hierarchy and locational principles:</p> <ul style="list-style-type: none"> • Focus on three towns • Greater focus on Hemel Hempstead • More even spread across borough <p>On the basis of the reasons in Appendix C, the rejection of the other potential distributions seems reasonable for Dacorum. The expectation remains that DBC will work with neighbouring LPAs and those in its HMA to plan for growth in the most sustainable locations.</p>
Include files	
Number	Question 37
ID	LPIO22823
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Growth should be focused on the three main towns Hemel, Berkhamsted and Tring.</p> <p>Also, could Bovington Airfield be used for a housing development?</p>
Include files	
Number	Question 37
ID	LPIO22833
Full Name	Wayne Church
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As a planning office I would urge you to plan for the good of everyone. Why can't a whole new village be created near good transport links that would take the pressure

	off of, not only Bovingdon, but Kings Langley and other lovely villages.
Include files	
Number	Question 37
ID	LPIO22839
Full Name	Alison Banister
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I think a new village should be built, with new houses, park, allotments, walkways/cycle paths, nursery school, infant & junior schools, Secondary school, Health surgery with GP's, dentists, complementary therapists, shops & more trees
Include files	

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	345
Filtered Respondents	340
Questions	<p>Question 38</p> <p>Has the Council considered all reasonable alternatives for distributing growth?</p> <p>Yes / No</p> <p><i>If no, please explain your reasons, and set out what other alternatives we should consider, with reference to evidence where available.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	ID-4764273-QUESTION-38
Pivot	<i>(none)</i>
Document Name	Question 38 - Summary Report
Created on	2019-04-23 09:58:59
Created by	Strategic Planning Admin

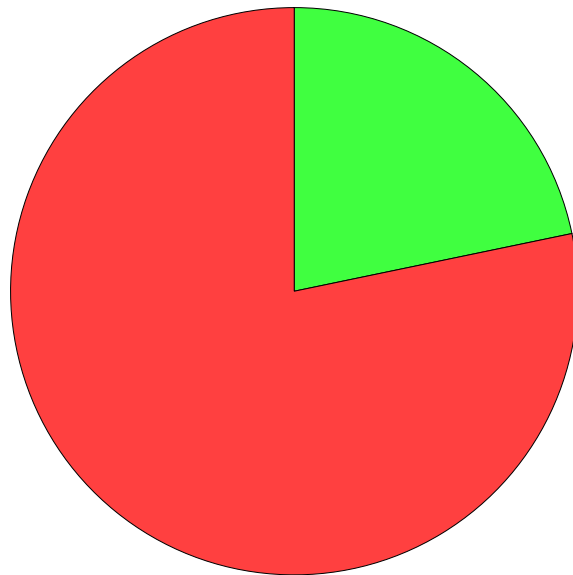
Your Opinion

Question responses: 345 (100.00%)

Question 38

Has the Council considered all reasonable alternatives for distributing growth?

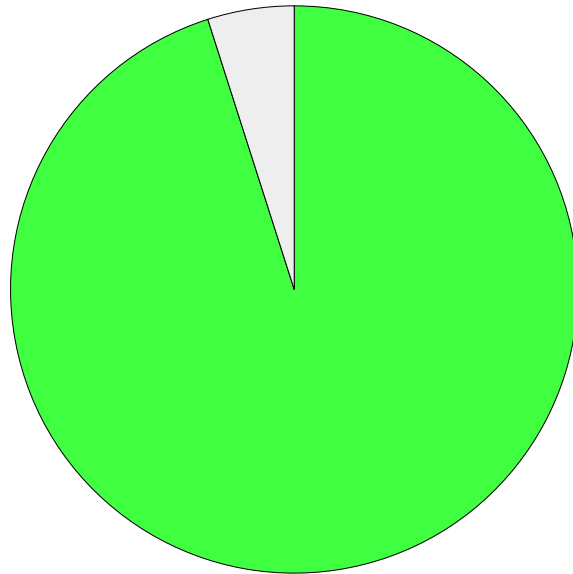
Yes / No



	% Total	% Answer	Count
Yes	21.74%	21.74%	75
No	78.26%	78.26%	270
Total	100.00%	100.00%	345

Responses

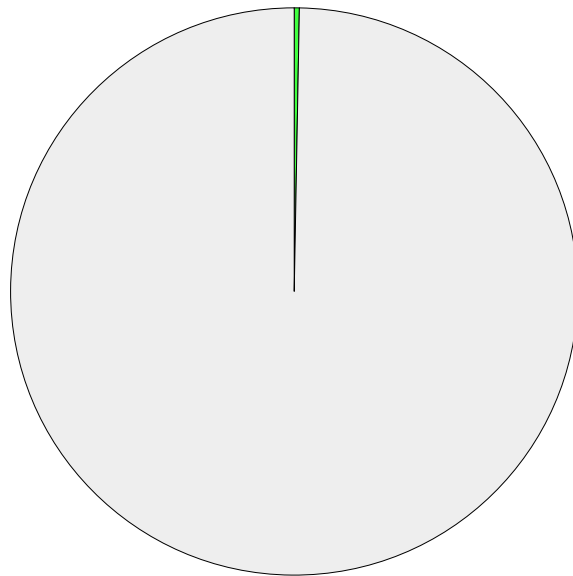
Question responses: **328 (95.07%)**



	% Total	% Answer	Count
Responses	95.07%	100.00%	328
No Response	4.93%	--	17
Total	100.00%	100.00%	345

Supporting evidence

Question responses: 1 (0.29%)



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	0.29%	100.00%	1
■ Responses with No Uploads	99.71%	--	344
Total	100.00%	100.00%	345

Issues and Options All Responses to Question 38

Number	Question 38
ID	LPIO198
Full Name	Mr Andrew Levy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Bovingdon Airfield? Its own web site describes it as 'A blank canvass'!
Include files	
Number	Question 38
ID	LPIO228
Full Name	Mr Martin Cotton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt incursion in Hemel Hempstead would be concentrated north of the town. Not acceptable.
Include files	
Number	Question 38
ID	LPIO347
Full Name	Mr David Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The three principle options of where to grow are reasonable, as is the consideration of the numbers to build, however I object to the apparent conclusion of using green belt and working farm land before consideration of brown field sites ... Bovingdon airfield being a good example
Include files	
Number	Question 38
ID	LPIO690

Full Name	Mr David Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No the proposed 3 options are logical - however the suggested implementation of each is inconsistent and unbalanced in its approach.
Include files	
Number	Question 38
ID	LPIO780
Full Name	Mr John Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There should be no development on any green field site before all brown field sites have been used and there must be no development on Green Belt land at all.
Include files	
Number	Question 38
ID	LPIO892
Full Name	Mr Ian Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As the proposal has only considered land put forward by Land owners and developers
Include files	
Number	Question 38
ID	LPIO945
Full Name	Ms Stephanie Knowles
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO1029
Full Name	Mr Dominic Lawrance
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Insufficient consideration of the possibility of a new settlement which will have less impact on the AONB and on existing settlements where resources are already stretched. E.g. the idea of developing at Bovington Airfield.
Include files	
Number	Question 38
ID	LPIO1051
Full Name	mr Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with favoured promoted land sites and their vague financial offers to pay for facilities the responsibility of the Council.
Include files	
Number	Question 38
ID	LPIO1120
Full Name	Ms Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO1218
Full Name	Miss Kylie Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Within the 'Issues & Options' consultation documentation the council have requested that they are informed of any additional brownfield sites which may not have been included for consideration. Given this request, I have assumed that there may still be some brownfield sites available and that the council have not fully explored and exhausted this option. The Council should share its findings of all land explored to demonstrate all brownfield sites have been identified and explored. The Council has stated several times within the documentation that it has to 'locate development to help support delivery of a 5 year housing land supply, as requested by Government' – this pressure from central government should be challenged as it is leading to 'knee jerk' proposals from local authorities, more evidence should be collated before 'rushing' such decisions. DBC should further investigate all land under its ownership, reconsider redistribution/change of use for existing industrial units which are underperforming, not fully occupied or are simply not an efficient use of space which could be used to meet housing targets.</p>
Include files	
Number	Question 38
ID	LPIO1341
Full Name	Mrs Catherine Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In Bovingdon, there is a site adjacent to Hyde lane and bordering the prison that has derelict office space and an area with water that is not used for anything currently. Although small, this could accommodate a number of houses or low rise flats or maisonettes. The car park to the front of the prison is also often disused and could be incorporated in the housing I have just suggested.</p> <p>The airfield is also a prime location for housing to be built and has access to the A41. Whilst I understand this</p>

	is not up for sale, if the price was right this would be the perfect and only area of development that Bovingdon could feasibly accommodate.
Include files	
Number	Question 38
ID	LPIO1361
Full Name	Mr Andrew Calderwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Reading the consultation documents, and noting the approach to selecting sites (see Question 11), it seems as if the Council has looked first at what sites have been proposed and then distributed the needed number of houses to those sites. It is relevant that these sites have been proposed by promoters looking to make a profit. Instead the Council should look first at the social and physical infrastructure and topography and assess what housing can be allocated to those towns. The whole approach is fundamentally flawed.
Include files	
Number	Question 38
ID	LPIO1513
Full Name	Mr Chris Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Hemel Hempstead should be developed first. There is plenty of space near the M1, on Jarman Park, the land opposite Gadebridge Park areas behind Grove Hill. All of these areas have the necessary infrastructure.
Include files	
Number	Question 38
ID	LPIO1641
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The 3 towns in Dacorum have quite different topographical characteristics and therefore considering arithmetical distribution on its own is not sensible. Development should go where it can most suitably be placed, and do least harm.
Include files	
Number	Question 38
ID	LPIO1719
Full Name	Ms G Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Your proposed plan is inconsistent and contradicts itself & doesn't address issue with the depth it deserves. There should be no building on Green Belt Land. Other options must be considered. Once the Green Belt goes, what is the plan then?
Include files	
Number	Question 38
ID	LPIO1822
Full Name	Mrs Pamela Kingsland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO1902
Full Name	Mr Richard Case
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and seem to have restricted the options offered to fit with favoured promoted land sites.
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
- As discussed with by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.
Compare this to the rest of the Borough. Tring has done its part (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

	<ul style="list-style-type: none"> Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO1971
Full Name	Mr Robert Emberson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposals appear to mainly consider land put forward by landowners & developers. Its clear they only wish to develop the best Green Belt land, around existing settlements which will make them the maximum profit. Feel the council should direct where they think the ideal sites are with the aid of consultees and not just choose from those already bought by developers. I think a new settlement should also be considered at this time, if it is in issue that the substantial amount of Green Belt land around the smaller tows & villages be built on.
Include files	
Number	Question 38
ID	LPIO2044
Full Name	Mrs Christine Mabley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Dispersal to reduce ghettoisation and increase infrastucture across more communities
Include files	
Number	Question 38

ID	LPIO2083
Full Name	Mr Christopher Giddings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The council has assumed that the majority of development will be performed by developers. I cannot see that the council has considered whether self builder style development would deliver a good proportion of the new houses in the areas with the most vocal local opposition.</p> <p>Whilst the council does have a self build register, it is poorly advertised and does not allow people so see where they may be able to build, instead it is a sign up process rather than a browsing for land experience.</p>
Include files	
Number	Question 38
ID	LPIO2177
Full Name	Mr Les Mosco
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold, and developments top date prove the point that the infrastructure is already not coping. – the only thing that has changed is that pressure on infrastructure has increased. In the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a 34%. All this without any improvements in infrastructure. Tring has also exceeded target by 5%. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Such disparities within Dacorum must be taken into account when assessing development numbers and site</p>

	<p>options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognised when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. Excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>Central Government's policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” – and the commitment to protecting Green Belt has been repeated many times. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO2196
Full Name	Mrs Karen Mellor
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>From question 6 above: 6.2.3 In 2014 and 2015 we asked developers and landowners to let us have details of sites that they felt were suitable for a range of developments, including housing, through a “call for sites” exercise. Information on additional sites is still coming forward. The majority of land promoted through this process was large sites in the Green Belt.</i></p> <p><i>Developers and landowners just want to maximise profit for themselves and their shareholders.</i></p> <p><i>The alternatives you have put forward for distributing growth are unrealistic as the small towns and villages are overloaded with people who are still indulging their love affair with fossil fuels.</i></p> <p><i>As mentioned before, I would like to be reassured that Dacorum is fully let and housing fully occupied and that all brownfield sites have been fully considered.</i></p> <p>I would like to see Dacorum (cross border collaboration with other counties if necessary) carefully consider a decently designed forward thinking small town somewhere (despite the fact that that may take us to</p>

	<p>past 2036). A new town that would fully embrace all of the environmental and ecological objectives set out in this Plan and the Current Core Strategy while combining some 'realistic' employment growth. I disagree with building on green belt within towns where it provides, a health, ecological and environmental barrier, however, I may be persuaded to support a small new town built on green belt land but then surrounded by further green belt land for health and well being as long as it was built in a mindful way to support all ages and to zero carbon sustainable standards. I do not approve of clone towns or shopping centres catering to Big Co's or corporations.</p> <p>Bovingdon Airfield could be the perfect brownfield site, although I do not have figures for the extent of this land or who owns it. It appears to have suitable access to the A41 .</p>
Include files	
Number	Question 38
ID	LPIO2349
Full Name	Mr George Bull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I cannot make any sense of this question. The reality is that the consultation is driven by sites offered for development, in other words what might be made to happen rather than what should happen. This produces a policy nightmare where realpolitik overrides policies and the interests of communities. The problem is particularly acute in Tring where the ownership of surrounding land by developers means not only a massive threat to Green Belt but also very large-scale developments which would completely swamp the character of the town. In proportion to its size, Tring is being asked to accept a far greater level of development than any other community yet no reason for, or recognition of, this is given.</p>
Include files	
Number	Question 38
ID	LPIO2430
Full Name	Mr David Glenister
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	More in depth consideration is need to look at existing brown field sites before even considering green belt land. Have all the sites been identified? With planinng control could more be freed up? Could there be better utilisation?
Include files	
Number	Question 38
ID	LPIO2503
Full Name	Mr Timothy Copeman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO2559
Full Name	Mr Kevin Kelly
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Without doubt all available brownfield sites have not, as yet, been considered.
Include files	
Number	Question 38
ID	LPIO2677
Full Name	Mrs Sue Lower
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Excluding growth options in rural areas and expansion of large villages should be reversed as is inconsistent with the strategic economic policy of supporting rural enterprise. It also will lead to either an increase in commuting into already overcrowded towns, not only Hemel but Berkhamstead and Tring or a migration of

	people to those areas which have jobs. This would result in reduction of village services even more and more pressure on the towns infrastructure.
Include files	
Number	Question 38
ID	LPIO2688
Full Name	Mr Alan Andrews
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building on green belt should not be allowed.
Include files	
Number	Question 38
ID	LPIO2893
Full Name	Mr Antony Harbidge
Company / Organisation	Berkhamsted Residents Action Group (BRAG)
Position	Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure. • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a

massive 34%. All this without any improvements in infrastructure.

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO3016
Full Name	Mr Paul Stanbridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	The plan seems, to a lay reader, to have been driven by the wishes of 'Property Developers' rather than a holistic planning approach to the needs and sustainable changes to the Borough.
Include files	
Number	Question 38
ID	LPIO3108
Full Name	mr hugh siegle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>If significant growth is forced upon us a more radical approach to the future size of Hemel Hempstead should be considered. Berkhamsted and Tring have already contributed well above targets by comparison.</p> <p>The conclusions of the Planning Inspector on Berkhamsted's ability to absorb growth remain unchanged ; rather given the amount of development in the Town in the last few years, these conclusions should be reinforced not ignored.</p>
Include files	
Number	Question 38
ID	LPIO3206
Full Name	Mrs Carolyn Hill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that there is relentless increasing pressure on infrastructure and road network.</p> <p>As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.</p> <p>The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest "Authority Monitoring Report & Progress on the Dacorum</p>

	Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. This should be compared to the rest of the Borough. Tring have hit their target without any improvements in infrastructure (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Berkhamsted has already been over developed without any improvements in delivery of amenities, social, education and health services and infrastructure.
Include files	
Number	Question 38
ID	LPIO3215
Full Name	Mrs Carolyn Hill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This would be hugely detrimental to Berkhamsted and Tring - historic market needs which need urgent protection from further overdevelopment.
Include files	
Number	Question 38
ID	LPIO3464
Full Name	Mrs Diana Calderwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Considering topography, character and existing constraints in the 2 smaller towns, focussing growth on Hemel Hempstead continues to be the better option as it will be possible to achieve infrastructure to match development. Just taking a quick and easy option on building on Green Belt land seems to go against all guidance and National planning Policy.
Include files	

Number	Question 38
ID	LPIO3525
Full Name	Mr Ashley Martin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>DBC have simply carried out a desk top arithmetical exercise to distribute growth between the sites promoted by developers and landowners without regard to the key principles set out and without regard to capacity or infrastructure issues. Berkhamsted simply cannot cater for any increased development without causing further pressure on the local environment or on local services.</p> <p>Berkhamsted has already delivered 34% above its target housing growth in the last 5 years compared to a 21% under-delivery in Hemel Hempstead. The demand for building in Berkhamsted is deriving from profit oriented developers who can make more money from building in the this town than elsewhere.</p> <p>The Government has re-stated recently that "Demand for housing will not change green belt boundaries" - June 2016. The demand from developers is not a reason to focus even more development on Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO3738
Full Name	Mr Andrew Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Hemel Hempstead needs to be the primary hub as it is best placed to site more local jobs and it has a 21% shortfall in its housing target.
Include files	
Number	Question 38
ID	LPIO3848
Full Name	Mr Robin Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As the council knows, there are many ways to accommodate growth, but they have forced us to make a choice of only 3 unacceptable choices
Include files	
Number	Question 38
ID	LPIO3864
Full Name	Mrs Suzette Phair
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Sites should be selected on suitability, not just on what sites are being put forward by landowners/developers
Include files	
Number	Question 38
ID	LPIO4163
Full Name	Mr Graham Hoad
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO4205
Full Name	Mr Douglas Gurney
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt land and villages should not be build on. Hemel Hempstead should take the new housing as it has the capacity.
Include files	
Number	Question 38

ID	LPIO4311
Full Name	Mr Alan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>DBC need to firstly ensure that the development yield from urban sites, previously developed land and imposition of appropriate higher densities is maximised. Sites identified through preparation of a Brownfield Register (required to be in place by Christmas 2017) will also contribute to a reduction in the need to take greenfield / Green Belt land.</p> <p>Further discussions under the Duty to Cooperate should also be held with both Three Rivers and St Albans District Councils in the allocation and delivery of development on the boundary between these authorities. In terms of Brownfield and developed sites, and in the light of the Chancellor's Autumn statement to encourage "high quality, high density" house building in town and city centres and around transport hubs, while "continuing the strong protection of our green belt", DBC should look at its own holdings and unused or under-used sites. (This could include introducing minimum densities for housing developments in these areas, along with policy changes to support the conversion of empty space above high street shops and retail and employment land into housing.)</p>
Include files	
Number	Question 38
ID	LPIO4402
Full Name	Mrs Victoria Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO4414
Full Name	Mr Bruce Morris
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sourced from BRAG as seems to cover it.</p> <p>Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.</p> <p>As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.</p> <p>The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure.</p> <p>Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,</p> <p>Such disparities within Dacorum must be taken into account when assessing development numbers and site options.</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits.</p> <p>As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt</p>

	boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO4540
Full Name	Mr Robert Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This is not simply a mathematical , proportional exercise but needs to be properly considered area by area.
Include files	
Number	Question 38
ID	LPIO4596
Full Name	Mrs Margaret Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO4694
Full Name	Mrs Maria Kennedy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Option 1a

Include files	
Number	Question 38
ID	LPIO4768
Full Name	Mr Keith Bradbury
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.
Include files	
Number	Question 38
ID	LPIO4827
Full Name	Mrs Sara Cooke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You have not considered an Option whereby Green Belt Development is spread across Hemel Hempstead, Berkhamsted and Tring, AND the larger villages. It seems to be either Hemel OR the larger villages. Surely if we include all 3 then each town/village takes less of a hit.
Include files	
Number	Question 38
ID	LPIO4833
Full Name	Mrs Sara Cooke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You have not considered an Option whereby Green Belt Development is spread across Hemel Hempstead, Berkhamsted and Tring AND the larger villages. It seems to be either Hemel OR the larger villages. Surely if we

	include all 3 then each town/village takes less of a hit. I don't understand why Green belt land around Hemel is not included in the "Spread more evenly across the borough" option.
Include files	
Number	Question 38
ID	LPIO4978
Full Name	Mr Michael Arrowsmith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The council seem to only have considered land that is or may become readily available. A more imaginative approach is needed based on determining where the most suitable locations lie rather than what landowners and developers may have offered up.
Include files	
Number	Question 38
ID	LPIO5031
Full Name	Mr Chris Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>(i) There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetical exercise and have at the same time restricted the options offered to fit in with favoured promoted land sites.</p> <p>(ii) Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.</p> <p>(iii) As acknowledged by DBC representatives at the consultation exhibitions, the growth distributions offered therein had been the result of a simple arithmetic exercise, which totally ignored such critical planning considerations as recent and on-going build against targets and local impact, given different topographies and (inadequate) supporting infrastructure.</p> <p>(iv) The current Core Strategy covers the 25 year period 2006 to 2031, and the technical appendix to the latest</p>

“Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that, in the first 5 years (2006-11) of the plan, Berkhamsted delivered 10 years' worth of new housing stock, and that by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All of this has been done WITHOUT ANY IMPROVEMENTS IN INFRASTRUCTURE. Compare this to the rest of the Borough: Tring has done its bit - 5% above target rate, whilst small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which the Inspector agreed was the correct place in which to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, but unfortunately at a rate some 21% below the target figure. So, all the shortfall that DBC claim needs to be picked up in the new plan comes from the unfortunate failure to concentrate on Hemel developments over the past 11 years, Such disparities within Dacorum MUST be taken into account when assessing future development numbers and site options.

(v) Hemel Hempstead, Berkhamsted and Tring have widely different topographical characteristics and infrastructure constraints/needs, which should be fully recognized when considering housing allocations between them. Housing distribution should not simply be a proportional arithmetical exercise - development should go where it can be most sensibly placed and be least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous, given the town's infrastructure constraints and current deficits.

(vi) As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town's historic character and setting” and excessive growth in Berkhamsted - as proposed in all but one of the options on the table - does not show this.

(vii) Central Government's policy on the Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor of the Exchequer in his recent budget speech. The main reason that the rate of build in Berkhamsted is so high is a simple function of demand from the developers, who can generate the highest profit margins by building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted, and under Government policy categorically MUST NOT lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO5181
Full Name	Jameson
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>DBC have followed an arithmetic exercise. The core strategy made it clear that additional housing 2006 - 2031 could not be sustained on existing infrastructure. This has not changed so why is additional housing being proposed?</p> <p>House building in Berkhamsted is already 34% above its target and yet Hemel is 21% below target. The predicted shortfall in Dacorum housing could be met by meeting the targets set for Hemel. This should be addressed first!</p> <p>Greenbelt land should be protected and the Government's policy states "demand for housing alone should not change Greenbelt boundaries". Deviation from this will negatively impact future generations and cannot be reversed.</p>
Include files	
Number	Question 38
ID	LPIO5285
Full Name	Mr Gary Ansell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Not enough research has been done into brownfield options for re-development and all brownfield sites should be included, not just those yielding over 10+ units.</p> <p>Due consideration needs to be taken of what TRDC put in their plan and how this will impact options in the DBC plan, in particular relating to Kings Langley as a cross-boundary village.</p>
Include files	
Number	Question 38
ID	LPIO5382
Full Name	Dr Rachael Frost
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	

Include files	
Number	Question 38
ID	LPIO5490
Full Name	Mr John Ingleby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO5510
Full Name	Mr Garrick Stevens
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36.</p> <p>Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <p>Following the Examination in Public in October 2012, the Inspector's report [July 2013] commented:</p> <p>"37. The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed.</p>

	<p>38. Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified. "</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to access amenities and achieve infrastructure to match development.</i></p>
Include files	
Number	Question 38
ID	LPIO5702
Full Name	Mr Alastair Greene
Company / Organisation	Little Gaddesden Parish Council
Position	Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO5818
Full Name	Mr Roy Farrant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Appendix C is not a proper consideration of the possibility of building a new settlement at all. No independent review seems to have been commissioned into this possibility. The council has decided without proper consideration.
Include files	
Number	Question 38
ID	LPIO5910
Full Name	Mr Michael Lelieveld
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We support the response put forward by Berkhamsted Town Council for this question.
Include files	
Number	Question 38
ID	LPIO5944
Full Name	Mr Grahame Partridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
Include files	
Number	Question 38
ID	LPIO6105
Full Name	Dr Gerwyn Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The current process is a one sided "Pull" only process that is reliant on proposals submitted by land owners / developers. Many of these are speculative and other than the provision of land for development meet very few of the design objectives. There needs to be an equivalent "Push" or 'nudge' component where professional planners identify tracts of land that better meet the local requirements. A simple trawl of the local OS map reveals an abundance of sites with excellent road and rail links that not only meet local requirements but also have little impact on the already strained infrastructure of our villages and towns.
Include files	
Number	Question 38
ID	LPIO6300

Full Name	dr kim goode
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It just doesn't feel as if there has been enough creativity in looking at possibilities of using existing sites.
Include files	
Number	Question 38
ID	LPIO6441
Full Name	Mr Peter Curtis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Use the brown field sites in the north of the borough
Include files	
Number	Question 38
ID	LPIO6445
Full Name	Mr andrew miller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No option to create a new village with purpose built infrastructure
Include files	
Number	Question 38
ID	LPIO6499
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	See answer to question 37.
Include files	
Number	Question 38
ID	LPIO6618
Full Name	Mr Alan Horn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I believe that the Council has considered all reasonable alternatives for distributing growth.
Include files	
Number	Question 38
ID	LPIO6637
Full Name	miss Daphne Kirst
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are too many empty houses. These should be the first focus. We should be opening our houses up for more people to share. Then the brownfield sites and self builds should be encouraged so the houses are owned by locals.
Include files	
Number	Question 38
ID	LPIO6783
Full Name	Miss Giulietta Cinque
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Within the 'Issues & Options' consultation documentation the council have requested that they are informed of any additional brownfield sites which may not have been included for consideration. It is therefore assumed that there may still be some brownfield sites

	<p>available and that the council have not fully explored and thus have not exhausted this option. The Council should share its findings to demonstrate all brownfield sites have been identified and explored. The Council has stated several times within the documentation that it has to 'locate development to help support delivery of a 5 year housing land supply, as requested by Government' – this pressure from central government should be challenged as it is leading to ridiculous proposals from local authorities. DBC should further investigate all land under its ownership, reconsider redistribution/change of use for existing industrial units which are not fully occupied or are not an efficient use of space which could be used to meet housing targets.</p> <p>As I've mentioned elsewhere, this area borders with Three Rivers, so it cannot be considered in isolation without taking that area and its plans/options into account too. Note Ovaltine, where a significant number of new dwellings have already been added to the housing stock of Kings Langley. Maybe there are brownfield sites in their area which could be utilised? What liaison are DBC undertaking with Three Rivers in order to ensure everything is taken into account over the WHOLE area, and is a unified approach being adopted?</p>
Include files	
Number	Question 38
ID	LPIO6972
Full Name	Mr Edward Castle-Henry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It is hard to say without seeing the greenbelt boundaries, housing boundaries, off bounds ect, but from my experience there are many ways to skin a cat.
Include files	
Number	Question 38
ID	LPIO7024
Full Name	mr michael hicks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	

Number	Question 38
ID	LPIO7066
Full Name	Mrs Gillian Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q. 36 to 45 No</p> <p>It seems that Berkhamsted has contributed housing for the current Core Strategy over and above the required amount and that other areas have not developed at the same rate. This does not seem to have been taken into account in preparing this consultation. <u>Berkhamsted</u> feels as if it is <u>bursting</u> with all the development currently underway and planned. The schools are pretty full, the Doctors are overworked, air pollution exceeds EU regulations, traffic at rush hours is dreadful, playing fields and playgrounds are very busy.</p> <p>Of all the options put forward the only one I feel would be acceptable is Option 1B.</p>
Include files	
Number	Question 38
ID	LPIO7128
Full Name	Mr & Mrs Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more</p>

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

BRAG RESPONSE TO Q38

Question 38

Has the Council considered all reasonable alternatives for distributing growth?

No

There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.

Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current

housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons

still hold – the only thing that has changed is that pressure on infrastructure has increased.

□

As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.

□

The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

□

Such disparities within Dacorum must be taken into account when assessing development numbers and site options.

□

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would

	<p>be disastrous given the town's infrastructure constraints and current deficits.</p> <p><input type="checkbox"/></p> <p>As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p><input type="checkbox"/></p> <p>Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>
Include files	
Number	Question 38
ID	LPIO7168
Full Name	Mr Francis Bedford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Because the current infrastructure (especially the narrow and inadequate arterial roads through the Borough - A41 excepted) I believe that a green-field sited, mini-New-town option would be best. It is regrettable if no machinery is available for inter-Borough cooperation on such a project
Include files	
Number	Question 38
ID	LPIO7340
Full Name	Brian and Heidi Norris
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We fully understand the need for additional housing in this country, but it should not be to the detriment of towns such as ours. We do not intend to reply to the 46 questions one by one, but support the answers given by the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group and support Option 1B in the Strategy Plan. Even this number of 600 further homes is, in our view, more than enough, but we understand that is an existing commitment.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38</p> <p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p><input type="checkbox"/></p> <p>Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons</p> <p>still hold – the only thing that has changed is that pressure on infrastructure has increased.</p> <p><input type="checkbox"/></p> <p>As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local</p> <p>impact given different topographies and (inadequate) supporting infrastructure.</p> <p><input type="checkbox"/></p> <p>The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first</p> <p>5 years (2006-11) of</p> <p>the plan Berkhamsted</p> <p>delivered 10 years worth of new housing stock and by 2016 the rate of development had</p>

exceeded

Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the

Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant

rate over the first 10 years of the CS, unfortunately at rate some

21% below the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

□

Such disparities within Dacorum must be taken into account when assessing development numbers and site options.

□

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably

placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would

be disastrous given the town's infrastructure constraints and current deficits.

□

As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but

one of the options on the table does not do this.

□

Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries”

(letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green

Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of

build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit

	margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO7433
Full Name	Rowan Scranage
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am unclear as to why Shendish has been included in Hemel's proposed plans. This makes it very difficult for residents of Kings Langley, or other interested parties, to select which would be their preferred option.</p> <p>If you are to vote with the purpose of protecting Kings Langley from huge development by opting for Options 1A or 1B then you are in fact supporting the fate of Shendish, as this has been classed as part of the Hemel Hempstead plans. Likewise, voting for 1C calls for the outwards expansion of Kings Langley as one of the large villages mentioned. It appears as if Kings Langley has been deliberately placed in a no win situation and effectively makes it a done deal! I feel that this has been done to force one of the developments into the Village.</p> <p>I am sure that there will have been many that have voted in favour of option 1A or 1B who are unaware of the implications that this will have on Kings Langley as they wont fully understand that</p> <p>If we must destroy the green belt to accommodate larger numbers of housing then we should do this in areas that can accommodate the creation of new infrastructure is possible and also does not fill in gaps creating larger conurbations</p>
Include files	
Number	Question 38
ID	LPIO7642
Full Name	Alan Corner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I was unable to come to the Consultation about the above but visited the exhibition. My feedback is as follows.</p> <p>I am in favour of building new homes in the area. My major concern is that the only sites considered for the developments in the village were proposed by local landowners and did not include the huge brown field site occupied by the old Bovingdon Airfield. Why o why was this site not strategically part of the Options when all the other sites involve major infrastructure changes to the heart of the village? The benefits of building homes on the airfield are many. Minimum use of green belt Option to create a bypass clear of the congested village roads All the necessary new infrastructure projects such as sewerage, schools, shops, utilities,etc could be built on the existing airfield and Market area with minimum disruption to the village both during their construction and the long term character of the village. Conclusion and Recommendation All the new homes and infrastructure projects be built on the airfield area which would cause minimum disruption to the village and to the surrounding green belt</p>
Include files	
Number	Question 38
ID	LPIO7684
Full Name	JUNE LIGHTFOOT
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Questions 36 to 39 No – see Question 40</p> <p>Question 40 Is Option 1B your preferred option for delivering the growth needs of the Borough?</p> <p>Yes.</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas</p>

of how to do this. The headline principle should include the wording, “within urban capacity”.

Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more options for growth distribution.

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.

Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

Central Government’s policy on Green Belt is clear: “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning, June 2016), and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO7777
Full Name	Ian McGinty
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I can only really speak on behalf of the effects to Berkhamsted but I'm sure the above mentioned issues would be duplicated in Tring which is why I cannot understand the so called three town option. Splitting the quota throughout all of Dacorum would seem a more sensible approach as it would not push any particular town past breaking point. Surely though by far the most positive and sensible approach would be to concentrate development in Hemel. There is absolutely zero chance that large scale development will improve towns like Berkhamsted or Tring (or the smaller villages) which at best will lose a great deal of what makes them work well today in every regard and it is completely disingenuous to suggest otherwise. However, carefully thought out planning that improves services and amenities in Hemel alongside the residential expansion could genuinely have a positive impact on the town. If anything the need for new houses could be seen as an opportunity to enhance Hemel as a place to both live and visit and that is somewhere where there could be a positive impact on the local economy.
Include files	
Number	Question 38
ID	LPIO7799
Full Name	Nigel Jeffs
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	My belief is that the fundamental principles of <u>the Greenbelt should be preserved at all costs</u> and <u>urban coalescence should be avoided</u> . After all 'we' are merely the custodians of our environment and it is our responsibility to preserve it for future generations – once it has gone it is gone forever. Hertfordshire as a whole and the Dacorum District is obviously a mixed environment of villages and towns and the look, feel and general character of all of our villages should be preserved. On this basis I feel that if any significant development were to take place then they should be done in or adjacent to the town areas and in locations that would avoid any further coalescence.
Include files	
Number	Question 38
ID	LPIO7823
Full Name	David and Marion Peacock

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Finally, we recognise the need for housing, not the least for our own children who might wish to stay in the village and work locally. May we urge you to focus in your plans on the three towns in the borough and to meet no more than the minimum Government Requirement for housing.
Include files	
Number	Question 38
ID	LPIO7925
Full Name	Dr Peter Chapman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO7964
Full Name	Mr Norman Groves
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I would like to confirm that I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. BRAG RESPONSE TO Q38 No <input type="checkbox"/> There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. <input type="checkbox"/>

Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons

still hold – the only thing that has changed is that pressure on infrastructure has increased.

□

As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local

impact given different topographies and (inadequate) supporting infrastructure.

□

The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of

the plan Berkhamsted

delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded

Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the

Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant

rate over the first 10 years of the CS, unfortunately at rate some

21% below the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

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Such disparities within Dacorum must be taken into account when assessing development numbers and site options.

□

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably

	<p>placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would</p> <p>be disastrous given the town's infrastructure constraints and current deficits.</p> <p><input type="checkbox"/></p> <p>As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but</p> <p>one of the options on the table does not do this.</p> <p><input type="checkbox"/></p> <p>Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green</p> <p>Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of</p> <p>build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit</p> <p>margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and</p> <p>under Government policy cannot lead to Green Belt boundary changes.</p>
Include files	
Number	Question 38
ID	LPIO8013
Full Name	Mr Michael Nidd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>There are many more permutations for growth distribution, but the evidence is that DBC has carried out a simple arithmetic exercise which restricted the options offered to fit with preconceptions and favoured promoted land sites. As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such considerations as the last 10 years' and on-going build against targets and its local impact given different topographies and such supporting infrastructure as exists or could be made to exist.</p>

	Development should go where it can be most suitably placed and least harmful.
Include files	
Number	Question 38
ID	LP108463
Full Name	Mr Peter Shell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Because of the above I am not in a position to myself provide detailed answers to all the questions, but have seen the response prepared by BRAG and agree with their comments which should also be regarded as my own.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in <p>Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at</p>

	<p>a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,</p> <ul style="list-style-type: none"> • Such disparities within Dacorum must be taken into account when assessing development numbers and site • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO8504
Full Name	Mr Lawrence Sutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.

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

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

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a

simple arithmetic exercise and restricted the options offered to fit with favoured promoted land

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
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Include files	
Number	Question 38
ID	LPIO8514
Full Name	Mrs Sarah Rees
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead,</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LP108522
Full Name	Spencer Holmes
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted</p>

and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LPIO8583
Full Name	Helen & Stuart Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action group have responded in full to the issues and options consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation the we wish DBC to duplicate BRAG's responses under our name.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has

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Include files	
Number	Question 38
ID	LPIO8681
Full Name	MRS G RUSSELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No 1- Development should be concentrated in Hemel Hempstead, which has brownfield and other land available, has the infrastructure, etc. 2- Bovingdon Airfield should perhaps be considered for development. Q38 No 1- see responses to Q37
Include files	
Number	Question 38
ID	LPIO8713
Full Name	MR NIGEL EGERTON-KING
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Council's proposals do not take into account constraints imposed by Berkhamsted's heritage, topography and over-stretched infrastructure. Growth in housing should be focussed on Hemel Hempstead which is a new town.
Include files	
Number	Question 38
ID	LPIO8744
Full Name	Mrs Pat Berkley
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG’s responses under my/our name.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit</p>

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	<p>over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO8777
Full Name	gregory lee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I don't think there has been a enough consideration over brownfield sites for housing development over greenfield. Or, as noted earlier those sites and industries that are already being changed by technology developments. AI modelling should be considered as part of this new world we live in to find the sites rather than automatically going for development on green belt. The combinations of factors are no doubt huge, perhaps more wide reaching in possibilities and impact that the current capability allows for? If in 5 years 20% of all buses running in Dacorum are electric & autonomous and there is only the need for 50% of the current servicing facilities would these sites not be a better solution for development over a beautiful grass field which hosts cows, deer, foxes, birds, butterflies, etc, etc, etc...</p>
Include files	
Number	Question 38
ID	LPIO8884
Full Name	mrs susan stier
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q38- NO-There has been over development in the 5 years 2006-11 of Berkhamsted and Tring, and underdevelopment of Hemel. Without any improvement to infrastructure.</p> <p>The planning inspector stated in his core strategy report- Berkhamsted's character needs protecting- only one of the options on the table apply.</p>
Include files	
Number	Question 38
ID	LPIO8965
Full Name	barney greenwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No – see Question 40 q40</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p>

	<p>Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>Central Government's policy on Green Belt is clear: "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning, June 2016), and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes</p>
Include files	
Number	Question 38
ID	LPIO9045
Full Name	Mrs Susan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO9058
Full Name	David Johnson
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No
Include files	
Number	Question 38
ID	LPIO9170
Full Name	S Langley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent

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Include files	
Number	Question 38
ID	LPIO9288
Full Name	Miss Tracy Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I attended the meeting held at the village hall which a couple of representatives were there. I feel that a proposal of up to 150 homes is far too excessive as Markyate has already under gone two major developments within the last 5 years(Hicks road and Top end of village).
Include files	
Number	Question 38
ID	LPIO9310
Full Name	SIMONE ROLLO
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Hertfordshire is a large county & I understand there needs to be houses built each year but where does it stop if we carry on We will sink. These proposals for Kings Langley are not the answer. Building apartments on top of Out of town Hypermarkets as the do in Europe is one way I believe Tesco have already suggested this? Otherwise we need another Milton Keynes built, find an area & start from scratch where schools, Heath, Hospital & infrastructures can all fit in surely that is the answer in my eyes.

	But not here, not for us, it's no for Kings Langley, keep our village a village please we love it just the way it is.
Include files	
Number	Question 38
ID	LPIO9713
Full Name	Mrs Caroline Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Surely it would be better to look at housing further North in the County or more towards the Thameslink line for trains that go into Kings Cross given its larger capacity vs that of Euston?
Include files	
Number	Question 38
ID	LPIO9783
Full Name	Aly MacLean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.

- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5** years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

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Include files	
Number	Question 38
ID	LPIO9831
Full Name	Mr Paul Wardle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure. <ul style="list-style-type: none"> • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy

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Include files	
Number	Question 38
ID	LP109859
Full Name	CR & LD JENNINGS
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>There is only a very little retail work in Bovingdon. Everyone would have to drive to work from Bovingdon. In particular Box Lane is already highly oversubscribed with traffic. Surely housing should be built near area's where employment is nearby eg Hemel Hempstead. The only area available in Bovingdon which meets this criteria is Bovingdon Airfield which has already been considered in the past. This would enable not only house building but Doctors, Dentists School, Shops and some businesses.</p> <p>We have been informed at the Bovingdon meeting that the owner's of the Airfield have shown no inclination to sell. Surely this is not a valid reason for not approaching them. Much of the Airfield is used for television and film work plus a Saturday market. Are these priorities ?</p> <p>Just because small land owners in Bovingdon wish to enrich themselves and have offered to sell this land to Dacorum is this the only reason that these pockets of land have been picked out?</p>
Include files	
Number	Question 38
ID	LPIO10006
Full Name	mr Kevin Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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	and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO10054
Full Name	Jill Mewha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted</p>

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Include files	
Number	Question 38
ID	LPIO10123
Full Name	Melanie Frankel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LPIO10171
Full Name	Natalie Crane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO10228
Full Name	Mr Tim Beeby
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO10275
Full Name	John and Jane Beeley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO10325
Full Name	Kathleen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing in response to the latest plan for housing development in Berkhamsted, most of which suggests an excessive and impractical number of new houses. I have read your Local Plan 2017 and I have read the reply of Berkhamsted Residents' Action Group (BRAG) and agree that <u>Option 1B is the only option acceptable</u>.</p> <p>I agree entirely with the BRAG response to your plan.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting <ul style="list-style-type: none"> • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in

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Include files	
Number	Question 38
ID	LPIO10374
Full Name	J&P Savage
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Secondly, the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

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Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land

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Include files	
Number	Question 38
ID	LPIO10439
Full Name	Mr Daniel Parry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10</p>

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BRAG response to Question (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LPIO10488
Full Name	David Burbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, <u>I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</u></p> <p><u>However, I would like to take this opportunity emphasize just a few of the most important points within that response</u></p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character</p>

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Include files	
Number	Question 38
ID	LPIO10538
Full Name	Mr Stephen Doughty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>I would however like to make a few specific comments.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p>

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Include files	
Number	Question 38
ID	LPIO10586
Full Name	Mr Roger Petts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>...</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and

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Include files	
Number	Question 38
ID	LPIO10633
Full Name	Simon Chilton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many</p>

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Include files	
Number	Question 38
ID	LPIO10683
Full Name	Sally and David Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please register as support for BRAG's submission.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has

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Include files	
Number	Question 38
ID	LPIO10731
Full Name	Mrs Jenny Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Five year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC has carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted has <u>exceeded by 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below</p>

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even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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	<p>recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO10825
Full Name	Grant Imlah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Moreover i am aware that The Berkhamsted Residents Action Group (BRAG) have responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG’s responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another</p>

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

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold –

the only thing that has changed is that pressure on infrastructure has

- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting
 - The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5** years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site
 - Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current
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Include files	
Number	Question 38
ID	LPIO10877
Full Name	Sheila Dawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have studied the above plan, accessed the BRAG website, and attended the Berkhamsted Citizens Association Visioning Evening on 15 November and the Berkhamsted Town Council presentation on 22 November.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting
 - The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5** years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in

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Include files	
Number	Question 38
ID	LPIO10925
Full Name	Jean Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Hemel Hempstead developments are 21% below the target figure. This shortfall should be taken into account in the new plans when assessing development numbers and site options.</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO10975
Full Name	Christopher Stafford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LP1011025
Full Name	Mrs Patti Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take

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Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Has the Council considered all reasonable alternatives for distributing growth?

- There are many more permutations for growth distribution, but clearly DBC have carried out a

simple arithmetic exercise and restricted the options offered to fit with favoured promoted land

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
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Include files	
Number	Question 38
ID	LPIO11072
Full Name	J M Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”.</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Hemel Hempstead developments are 21% below the target figure. This shortfall should be taken into account in the new plans when assessing development numbers and site options.</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted</p>

	<p>proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO11104
Full Name	Denis Maclure
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>see [preferred option] Question 40 (below)</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>Sections of the consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity".</p> <p>Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p>

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Include files	
Number	Question 38
ID	LPIO11152
Full Name	Cally Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold –

the only thing that has changed is that pressure on infrastructure has increased.

- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
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Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development.

Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits.
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- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building

	in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO11199
Full Name	Mr Neil Aitchison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q38 No see Q4 (below)</p> <p>The Vision Statement is complacent and merely refers to the status quo . This should be rewritten as a Mission Statement with proper objectives. Hemel Hempstead would benefit from regeneration and better support of its town centre if the town created some larger “garden villages “ with new local centres linked to infrastructure improvements because it has the scope for more local employment with a business park than the market towns. DBC could learn from AVDC. The overarching strategy to achieve regeneration is still missing. The reference to local services in the other towns is understated. Berkhamsted is stressed eg School places, parking , station parking, bus services highway limitations.The fifth paragraph is incorrect . There is no further employment or employment land in Berkhamsted. This has reduced as a result of brown field development. The Homes and Communities Agency and possibly the Crown Estates should be brought into consultation and made to bring their land forward rather than hoarding land as at present as in Hemel Hempstead i.e. Marchmont Farm. This site was recommended by the previous planning inspector .</p> <p>Suggested Mission Statement:-</p> <ol style="list-style-type: none"> 1 DBC will progress an overarching strategy to new housing requirements over and above those planned on a holistic basis creating new communities with adequate infrastructure and services in the right places with an emphasis on Hemel Hempstead regeneration by creating sustainable “garden village” neighbourhoods with their own local services. 2 DBC will strive to work with stakeholders to provide sustainable development that limits impact on existing residents and where planned will provide for additional services in parallel . Preferred locations will be provided with good transport links or be close to public transport nodes or local employment facilities or provided with new facilities.

	<p>3 Green Belt developments which do not meet holistic criteria or overload unsustainable infrastructure will be rejected.</p> <p>4 DBC will seek to work with the local communities to progress plans on a detailed consultation basis to lessen impact.</p>
Include files	
Number	Question 38
ID	LPIO11247
Full Name	Jon Rollit
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO11296
Full Name	Kate Locke
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In addition I would reiterate the extensive points made in the BRAG response to the 'Issues & Options' consultation. I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. The Berkhamsted Residents Action Group (BRAG) has responded in full.</p> <p>In addition, I like to take this opportunity emphasize just a few of the most important points within that response. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LPIO11385
Full Name	Ms Lorraine Gilmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>BRAG has responded in full to the ‘Issues & Options’ consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this email as confirmation that I wish Dacorum Borough Council (DBC) to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasise some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for</p>

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Include files	
Number	Question 38
ID	LPIO11435
Full Name	Conian
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure, whilst also attracting high levels of infrastructure investment. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel</p>

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Include files	
Number	Question 38
ID	LPIO11495
Full Name	Mr Alan Ledger
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Council's proposals do not take into account constraints imposed by Berkhamsted's heritage, topography and over-stretched infrastructure. Growth in housing should be focussed on Hemel Hempstead which is a new town.
Include files	
Number	Question 38
ID	LPIO11541
Full Name	Ms Eliza Hermann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Dacorum's towns and villages have different topographies, heritage legacies and infrastructure constraints, as well as different opportunities for brownfield redevelopment and regeneration, all of which should be taken into account when considering growth distributions. Housing distribution should not be an arithmetical exercise, rather, development should go where it can be most sustainably placed and least harmful. The Planning Inspector stated in his report on the 2006-2031 Core Strategy that development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting." Any additional development beyond that already planned for in Berkhamsted would create severe harm with regard to historic character and setting, as well as making current infrastructure deficits even worse.</p> <p>The Planning Inspector said (paragraphs 37 and 38) -</p> <p>"37. The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed.</p> <p>1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services</p>

	<p>and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified.</p> <p>“</p> <p>I believe the Planning Inspector's conclusion as stated above remains sound today, and that focussing growth on Hemel Hempstead is justified.</p>
Include files	
Number	Question 38
ID	LP1011562
Full Name	Ms Anna Barnard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1 In the Core Strategy, development in the Borough will be managed through a 'settlement hierarchy' with small villages and the countryside together with small villages in the Green Belt and rural area being areas of development constraint, large villages and market towns having limited opportunity and Hemel Hempstead being the area where development will be concentrated (para 1.8 of the Core Strategy).</p> <p>Therefore the sites proposed for Potten End and Wilstone are clearly unacceptable unless it can be proved that these are for a local need; development in Markyate, Bovingdon and Kings Langley should be limited retaining the characteristics of villages and development in Berkhamsted and Tring having limited opportunity with the retention of Berkhamsted's unique valley setting and the retention of Tring's clearly defined boundaries (para 8.24 of the Core Strategy).</p> <p>Dacorum is sacrificing all the good qualities that exist in the Borough to ever increasing and damaging development which cannot be for the benefit of the residents of the Borough for whom they are supposed to safeguard this attractive Borough. It is increasingly being joined to Watford (by the massive development KL-h3 in Kings Langley) and Redbourn and St Albans (by the massive development HH-h1b to the north of Hemel Hempstead.) The important river valley of the Gade will be ruined by development which virtually joins Kings Langley to Hemel Hempstead (KL-h2) and by development on both sides of its northern flow by HH-1a and HH-h2</p>
Include files	
Number	Question 38
ID	LP1011623

Full Name	Janet and James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
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Include files	
Number	Question 38
ID	LPIO11777
Full Name	Edmund Hobley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have</p>

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Brag Response to question 38 (please note full document is attached to Q46)

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- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold –

the only thing that has changed is that pressure on infrastructure has increased.

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Include files	
Number	Question 38
ID	LPIO11794
Full Name	Rodney O'Callaghan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1 Geography,</p> <p>The Dacorum Plan ignores activities in areas adjacent to Tring Town but in neighbouring Counties : The Pistone Cement works development has already added several hundred new homes for which Tring is expected to provide</p> <p>services (the are already significant numbers from this development at Tring schools.</p> <p>In the near future Halton Camp is due to close the space made available will add in excess of 1000 new homes whose inhabitants will in many cases use Tring as a hub .</p> <p>Because these developments are in adjacent counties they are ignored by Dacorum Planners.</p> <p>1 Fairness,</p> <p>Were Tring to be treated in a similar fashion to the rest of Dacorum the proposals would be for significantly smaller development For example Berkhamstead with a population of 21000 is only proposed for an increase of 22% a lot</p> <p>less than the 330% for Tring .Hemel Hempstead and Kings Langley are similarly proposed for much lower increases.</p> <p>It seems to those who live here that our lack of electoral strength is resulting a the Town getting poor deal.</p>
Include files	
Number	Question 38
ID	LPIO11927
Full Name	Janet Mason
Company / Organisation	Berkhamsted Town Council

Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics, heritage legacies and infrastructure constraints which should be recognized when considering housing allocations between them. Housing distribution should not simply be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. The Planning Inspector stated in his report on the Core</p> <p>Strategy [see Q9 for the reference] that development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting.”</p> <p>Any additional development over and above that already planned for in Berkhamsted would create significant issues given the town’s infrastructure constraints and current deficits.</p> <p>Moreover the Inspector said in Para 37 & 38:</p> <p>“37. The Council’s approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change.</p> <p>Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough’s growth should be changed.</p> <p>1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council’s approach of focussing growth on Hemel Hempstead is justified.</p> <p>“</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p>
Include files	
Number	Question 38
ID	LPIO11973
Full Name	Dee Sells
Company / Organisation	Markyate Parish Council

Position	Parish Clerk/ RFO
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Markyate Parish Council has made its comments earlier in the consultation. We do not believe that any new housing should be considered until the water supply issue is resolved. We do not believe Markyate is appropriate for any further building save to meet local needs.
Include files	
Number	Question 38
ID	LPIO11989
Full Name	Mark Behrendt
Company / Organisation	Home Builders Federation
Position	Planning Manager – Local Plans
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In particular we would challenge the need to use brownfield land prior to greenfield sites. If the Council cannot meet its needs within the urban area then it will need to bring forward greenfield sites. Whether these come before or after the development of brownfield land should not be a consideration. By unnecessarily delaying the delivery of greenfield sites the Council will be limiting its options for addressing any backlog and meeting housing needs in the early part of the plan. As such any policy delaying delivery of greenfield sites would be unsound and should not be included in the Local Plan.
Include files	
Number	Question 38
ID	LPIO12075
Full Name	David Wilyman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in

the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

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

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

Standard BRAG response to Question 38. Please note full document is attached to Question 46

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LPIO12171
Full Name	Ray Dann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall</p>

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Include files	
Number	Question 38
ID	LPIO12230

Full Name	Douglas & Christina Billington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand</p>

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	<p>arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current defecits.</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO12309
Full Name	Richard Frankel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another</p>

Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first

10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

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Standard BRAG response to Question 38. Please note full document is attached to Question 46.

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has

- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting
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	in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO12376
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO12400
Full Name	ms rona morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sourced from BRAG as seems to cover it.</p> <p>Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.</p> <p>As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.</p> <p>The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure.</p>

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Include files	
Number	Question 38
ID	LPIO12453
Full Name	Judy Halden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.

To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

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

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

Standard BRAG response to Question 38. Please note full document is attached to Question 46.

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LPIO12501
Full Name	Meenakshi Jefferys
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
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Include files

Number

Question 38

ID	LPIO12548
Full Name	Mrs Jane Barrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of</p>

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Include files	
Number	Question 38
ID	LPIO12598
Full Name	mr paul healy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation</p>

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	is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO12648
Full Name	Merrick Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasise just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional</p>

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Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting
 - The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest "Authority Monitoring Report & Progress on the Dacorum Development Programme" reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in

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where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site
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Include files	
Number	Question 38
ID	LPIO12696
Full Name	Monika & Casper Gibilaro
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’

consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under our name

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

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
 - The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.

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- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
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	<p>to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <ul style="list-style-type: none"> Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO12744
Full Name	Lorna Ginn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has

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	in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO12793
Full Name	Mr Raymond Phipps
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</p> <p>...</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure. <ul style="list-style-type: none"> • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. <p>Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and</p>

countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

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Include files	
Number	Question 38
ID	LPIO12840
Full Name	Ingrid Carola McKenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but it seems clear that DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech.</p> <p><i>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. Beyond short term financial</i></p>

profit developers have no interest in the wellbeing of the town, the local council and its residents. Once having built and taken their profit developers leave the residents and local council to deal with the fallout.

Such demand from developers is Absolutely the Wrong reason to focus even more development on Berkhamsted.

Further, under Government policy it cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LP1012888
Full Name	Mr Stephen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</p> <p>...</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p>

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
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Include files	
Number	Question 38
ID	LPIO12942
Full Name	Jon Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in</p>

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Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
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Include files

Number	Question 38
ID	LPIO12991
Full Name	Edward Keane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change</p>

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Include files	
Number	Question 38
ID	LPIO13040
Full Name	Bettina Deuse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would</p>

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BRAG response to question 38 below (full BRAG response see question 46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO13093
Full Name	Mr Paul Tinworth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</p> <p>...</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure. <ul style="list-style-type: none"> • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy

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Include files	
Number	Question 38
ID	LPIO13141
Full Name	Hilary Dann
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a</p>

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Include files	
Number	Question 38
ID	LPIO13269
Full Name	D. Phillips
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully concur with the comments attached from BRAG. The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicated that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, 'within urban capacity'. Export to another Council area should not be rejected, specifically the St Albans land East of Hemel. There are many more</p>

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Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO13475
Full Name	Mrs Catherine Imber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. As a result it is already struggling.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town's historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>Option 1B is the only one acceptable for Berkhamsted</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting
 - The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5** years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site
 - Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current
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	State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO13523
Full Name	Deborah Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
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Include files	
Number	Question 38
ID	LPIO13580
Full Name	Mr Alan O'Neill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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

To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases

Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.

Development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted.

Of the options put forward, **Option 1B is the only one that would be acceptable for Berkhamsted.**

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LP1013631
Full Name	Sue O'Neill
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation.</p> <p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p> <p>Development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.</p> <p>The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted.</p> <p>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact

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Include files	
Number	Question 38
ID	LPIO13693
Full Name	Tim Uden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LPIO13758
Full Name	Edward Hatley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.

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

Sections of this consultation suggest that, to support the 5 year housing land supply, will require Green Belt releases immediately. Obviously, a 5 year housing land supply needs to be properly identified but the consultation document indicates that DBC have ill-conceived ideas of how to do this.

The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.

There are many more permutations for growth distribution, but DBC appear to have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.

Over the first 10 years of the current Core Strategy, Berkhamsted has **exceeded** the target by a massive 34% without any improvements in infrastructure. The problems with parking (which the proposed ill-conceived multi-storey car park will not solve), insufficient medical facilities and the impact on our schools are just a few of the areas that need addressing.

In contrast, Hemel has developed at a rate some 21% **below** the target figure. The entire shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options.

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs that should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful.

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more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO13809
Full Name	Mr Roger Didham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
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Include files	
Number	Question 38
ID	LPIO13864
Full Name	Alex Dann

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning</p>

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Include files	
Number	Question 38
ID	LPIO14033
Full Name	Danny Jennings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum's Local Plan.

...

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Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO14082
Full Name	Mr John Goffey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response to the DBC <i>Issues and Options</i> document. We would, in addition, like to add the following points concerning Question 33 of the above document.</p> <p>...</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the

options offered to fit with favoured promoted land sites

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
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Include files	
Number	Question 38
ID	LPIO14130
Full Name	Sue Elleray
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO14181
Full Name	Mr Richard White
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</p> <p>...</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure. <ul style="list-style-type: none"> • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. <p>Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,</p> <ul style="list-style-type: none"> • Such disparities within Dacorum must be taken into account when assessing development numbers and site options <ul style="list-style-type: none"> • Hemel Hempstead, Berkhamsted and Tring have quite different topographical

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Include files	
Number	Question 38
ID	LPIO14326
Full Name	Ms Vicky Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as do confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation</p>

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Include files	
Number	Question 38
ID	LPIO14410
Full Name	Ray Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
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Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However,

this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

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Include files	
Number	Question 38
ID	LPIO14459
Full Name	Giselle Okin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO14508
Full Name	Mr David Griffin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</i></p> <p><i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i></p> <p><i>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban</i></p>

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Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has

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Include files	
Number	Question 38
ID	LPIO14785
Full Name	Ms Paula Farnham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues & Options' consultation. I could make similar comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity to emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
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Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at

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Include files	
Number	Question 38
ID	LPIO14817
Full Name	Steve Baker
Company / Organisation	CPRE - The Hertfordshire Society
Position	Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	It is abundantly clear that the approach to distributing growth has been skewed by the availability and promotion of green field sites by developers. As mentioned in other responses to this consultation by CPRE Herts, the key to distributing growth throughout Dacorum should concentrate on land and buildings within settlements that can be developed or redeveloped without the release of Green Belt land in accordance with the NPPF and within other planning constraints. The regeneration of previously developed land should be the first consideration for distributing growth.
Include files	
Number	Question 38
ID	LPIO14857
Full Name	Bev Mckenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”. Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but it seems clear that DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from</p>

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The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted.

Beyond short term financial profit developers have no interest in the wellbeing of the town, the local council and its residents.

Once having built and taken their profit developers leave the residents and local council to deal with the fallout.

Such demand from developers is Absolutely the Wrong reason to focus even more development on Berkhamsted.

Further, under Government policy it cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO14903
Full Name	Mr Michael Curry
Company / Organisation	Tring Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In principle these have been covered, but the ability to use the alternatives as stated is, at best, not proven.
Include files	
Number	Question 38
ID	LPIO14960
Full Name	Malcolm and Jill Allen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in

the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.

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

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

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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 - The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site
 - Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current
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	<p>to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do</p> <ul style="list-style-type: none"> • Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO15010
Full Name	Mr Clive Freestone
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a</p>

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Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has
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Include files

Number	Question 38
ID	LPIO15058
Full Name	Mr & Mrs D A Simmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. We request you accept this summary as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>We would like to take this opportunity to emphasize a few of the most important points within that response, <i>in particular our response to Q25.</i></p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change</p>

Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

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Include files	
Number	Question 38
ID	LPIO15106
Full Name	Grand Union Investments
Company / Organisation	Grand Union Investments C/O Savills
Position	Associate Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • At paragraph 3.2 of the consultation document, the Council seeks views upon three options for the way in which future growth should be distributed, as follows: <ul style="list-style-type: none"> • Option A - Focus on three towns; • Option B - Greater focus at Hemel Hempstead; • Option C – Spread more evenly across the Borough • We explain above about the importance of ensuring that growth locations are chosen on the basis of sustainability principles. Within this

context, the following provides consideration of each of the three growth options put forward by the Council:

Option A - Focus on three towns

Of the options put forward by the Council, Option A offers the best opportunity for growth in the Borough to take place in a sustainable way. We note from evidence contained within the Council's Settlement Hierarchy Study at Table 4 that the main towns of Hemel Hempstead, Berkhamsted and Tring are the only settlements in the Borough that benefit from 'higher order services', 'at least 6 key services' and a 'high' 'accessibility audit outcome'. Therefore and according to the methodology adopted by the Council to determine its settlement hierarchy, it is clear that the Council should adopt an approach in which growth is mainly focussed on the three main towns. However, and as we explain at paragraphs 3.2. and 3.3. and at paragraph 8.12. below, it is important that undue emphasis is not placed upon Hemel Hempstead as part of this strategy.

Option B - Greater focus at Hemel Hempstead

- This approach would not offer a sustainable way forward. Firstly, and by way of context, the Settlement Hierarchy Study at paragraph 4.6.4. explains that the development of around 5,400 to 5,700 new homes are planned for at Hemel Hempstead by the existing Development Plan, compared to 320 across the other two towns of Berkhamsted and Tring. Therefore, Hemel Hempstead has been the focus for significantly higher levels of growth than any other location over recent years and it is important that this approach is not continued by the new Local Plan.
- We have identified at paragraph 8.6 above that there is already a higher proportion of the working population in Berkhamsted that travels to work by public transport than in Hemel Hempstead and that Berkhamsted also has a lower proportion of its workforce than Hemel Hempstead that travels to work by car. Against this background, the danger of continuing to focus growth in one location is that infrastructure becomes overburdened. In turn, the impact of this can result in shifts towards the use of less sustainable modes of transport such as the private car. At the Borough level, this could see a worsening in the current situation in which there is further shift away from movement by sustainable transport modes at Hemel Hempstead.
- A further consideration is that of the deliverability of the strategy within the period of the Local Plan. A greater focus of growth at Hemel Hempstead under this option is likely to create a greater risk to delivery because of the reliance upon one local market to absorb enhanced levels of market sales over and above historic rates. Consequently, undue focus upon Hemel Hempstead could see the Council's failure to deliver the overall levels of growth that are required.

	<ul style="list-style-type: none"> Finally, the adopted growth strategy must be sufficiently flexible to ensure that if given sites or locations do not deliver growth at anticipated rates, then there is provision within the strategy for other parts of the plan to take up the shortfall. A strategy that identifies Berkhamsted on an equal footing alongside Hemel Hempstead and Tring, will be more flexible and more likely to ensure that the Local Plan is sound. <p>Option C - Spread more evenly across the Borough</p> <ul style="list-style-type: none"> Option C does not present a sustainable way forward. Whilst such an approach might present opportunity for the Borough's rural economy, it would not represent a sustainable way forward taking sustainability considerations into account as a whole. In determining a settlement hierarchy for the Borough, the methodology established by the Council in its Settlement Hierarchy Study places accessibility to services as a central consideration for this. It is noted that at Table 4 of the Settlement Hierarchy Study, only three settlements outside of the three main towns benefit from accessibility to at least six key services. Consequently, and outside of these three other settlements and the three main towns, all other settlements in the Borough are assessed by the Council as having either a 'fair' or 'poor' accessibility audit outcome. In spreading the distribution of growth, there would be considerable pressure for development to take place at locations with such a fair or poor accessibility ranking. As such, this underlines that there is a significant danger that unsustainable patterns of growth will arise from a dispersal strategy. In light of the above, a suitably balanced approach is required in guiding development to the three main towns. Thus Option A is our favoured option, provided undue emphasis is not placed upon Hemel Hempstead.
Include files	
Number	Question 38
ID	LPIO15155
Full Name	Mr David Broadley
Company / Organisation	Aylesbury Vale District Council
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Issue 28 - What are the Growth options?</p> <p>p.97 – Distribution Options – Why are there only three distribution options and is there a reason a new settlement (significant expansion of a single major settlement other than Hemel Hempstead) has not been considered?</p>

Include files	
Number	Question 38
ID	LPIO15287
Full Name	Caroline Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38: <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure. • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development

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- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO15337
Full Name	Mr Alan Conway
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues & Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q33 to Q45 I support the BRAG submission. Yet again the failure to provide an accurate base from which to proceed renders much of what follows suspect and in many parts misleading.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. • Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

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Include files	
Number	Question 38
ID	LPIO15386
Full Name	Sue Wolstenholme
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p>Standard BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p>

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.
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Include files	
Number	Question 38
ID	LP1015448
Full Name	Nick Hanling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this.</p> <p>The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.</p>

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Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest "Authority Monitoring Report & Progress on the Dacorum Development

Programme” reveals that in the first **5** years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
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Include files	
Number	Question 38
ID	LPIO15496
Full Name	Sarah and Nigel Tester
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation and I have attached their response which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill- conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent</p>

budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be

	<p>recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO15553
Full Name	Miss Tanya Assarat
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
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	<p>been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>
Include files	
Number	Question 38
ID	LPIO15602
Full Name	Melanie Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p>The restrictions on housing in the villages are often illogical and could be amended to help meet the housing targets. For instance in Potten End there is a site on Hempstead Lane near Chestnut Close which had one very small bungalow on a large plot. I understand that the present regulations restrict redevelopment. Its nonsensical. I have not surveyed the plot but I think it could take 3 good sized houses with adequate gardens. the use of land within villages or where there has been a dwelling previously should be used to the maximum extent provided it is in keeping. However, in all other respects I oppose enlargement on the edge of the villages which would encroach on the Green Belt and destroy their character just as the plans you have put forward would destroy Berkhamsted's.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold –

the only thing that has changed is that pressure on infrastructure has increased

- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
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	in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO15668
Full Name	Mr James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. Compare this to

the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

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Include files	
Number	Question 38
ID	LPIO15727
Full Name	Mark Pawlett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO15775
Full Name	Maria & Colin Sturges
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO15822
Full Name	David Kerrigan
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p>No – see Question 40</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

	<ul style="list-style-type: none"> • Such disparities within Dacorum must be taken into account when assessing development numbers and site options • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO15880
Full Name	D B Land and Planning
Company / Organisation	D B Land and Planning
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • DBLP consider that the Council has considered all reasonable alternatives in accommodating growth.
Include files	
Number	Question 38
ID	LPIO15895
Full Name	Mrs Sue Yeomans
Company / Organisation	Chilterns Countryside Group

Position	Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1.iv. The LP identifies the 3 main towns of the Borough: Hemel Hempstead, Berkhamsted and Tring. Hemel Hempstead is the larger town with greater scope for supporting expansion and infrastructure. All 3 have good access to London and larger conurbations such as Watford and Milton Keynes by road and rail.</p> <p>1.v. From a relatively small Old Town, housing at Hemel Hempstead has specifically been developed as 'spokes' of a wheel emanating from that centre, incorporating purpose-built main and local shopping centres, green spaces, schools for all ages, community facilities and churches. Provision of appropriate health care facilities remains a contentious issue. Major and significant investment has been expended upon the town, businesses and its retail centre, which can easily support and would indeed welcome increased footfall, employment opportunities and income generation.</p> <p>1.vi. Berkhamsted and Tring, in particular, are smaller traditional 'ribbon' market towns with historical centres, where housing & associated infrastructure have grown organically. Education and healthcare present challenges to accommodate existing population. Both towns are surrounded by the Chilterns Area of Outstanding Natural Beauty (AONB) and significant swathes of Green Belt, which define and inform the characters of the towns and the AONB itself.</p> <p>1.vii. The methodology used by DBC to calculate future housing needs is taken from the recent Dept. for Communities and Local Government Consultation paper '<i>Planning for the Right Homes in the Right Places</i>', 2017. As this Consultation only closed in November, no feedback or comments have yet been incorporated into this methodology and it is not, as yet, statutory. We find it premature therefore that such important calculations have been based on as yet unproven methodology, which as discussed with officers at one of the DBC Public Exhibitions, does not reflect the peculiar characteristics of different localities.</p> <p>1.viii. As identified in pts 1.v & 1.vi, the Borough's three main towns are very different with hugely varying abilities to support and sustain large increases in population, as suggested in some options of the LP. This is not sufficiently taken into account in calculating population growth and housing needs.</p>
Include files	
Number	Question 38
ID	LPIO15989
Full Name	Mr Robert Sellwood
Company / Organisation	The Crown Estate

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The three options consulted on represent the reasonable alternative. However, scope does exist to select a 'hybrid' which combines elements from different options.
Include files	
Number	Question 38
ID	LPIO16079
Full Name	Dave Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO16134
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.

	<p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO16193
Full Name	Stuart Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO16250
Full Name	Stuart Mears
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</p> <p>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</p>

	<p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO16311
Full Name	Kitty Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>please find the attached report written on mine and other residents request.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO16373
Full Name	Aaron Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support GFRA responses see below.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>

Include files	
Number	Question 38
ID	LPIO16421
Full Name	Ruth and Stephen Wright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does</p>

not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest "Authority Monitoring Report & Progress on the Dacorum Development Programme" reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

	<ul style="list-style-type: none"> • Such disparities within Dacorum must be taken into account when assessing development numbers and site options • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO16486
Full Name	Andrew Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered</p>

	by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.
Include files	
Number	Question 38
ID	LPIO16502
Full Name	Andrew Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation. CCG response to question 38 full document attached to question 46</p> <p>.iv. The LP identifies the 3 main towns of the Borough: Hemel Hempstead, Berkhamsted and Tring. Hemel Hempstead is the larger town with greater scope for supporting expansion and infrastructure. All 3 have good access to London and larger conurbations such as Watford and Milton Keynes by road and rail.</p> <p>....</p> <p>1.v. From a relatively small Old Town, housing at Hemel Hempstead has specifically been developed as 'spokes' of a wheel emanating from that centre, incorporating purpose-built main and local shopping centres, green spaces, schools for all ages, community facilities and churches. Provision of appropriate health care facilities remains a contentious issue. Major and significant investment has been expended upon the town, businesses and its retail centre, which can easily support and would indeed welcome increased footfall, employment opportunities and income generation.</p> <p>1.vi. Berkhamsted and Tring, in particular, are smaller traditional 'ribbon' market towns with historical centres, where housing & associated infrastructure have grown organically. Education and healthcare present challenges to accommodate existing population. Both towns are surrounded by the Chilterns Area of Outstanding Natural Beauty (AONB) and significant swathes of Green Belt, which define and inform the characters of the towns and the AONB itself.</p> <p>1.vii. The methodology used by DBC to calculate future housing needs is taken from the recent Dept. for Communities and Local Government Consultation paper '<i>Planning for the Right Homes in the Right Places</i>', 2017. As this Consultation only closed in November, no feedback or comments have yet been incorporated into this methodology and it is not, as yet, statutory. We find it premature therefore that such important calculations</p>

	<p>have been based on as yet unproven methodology, which as discussed with officers at one of the DBC Public Exhibitions, does not reflect the peculiar characteristics of different localities.</p> <p>1.viii. As identified in pts 1.v & 1.vi, the Borough's three main towns are very different with hugely varying abilities to support and sustain large increases in population, as suggested in some options of the LP. This is not sufficiently taken into account in calculating population growth and housing needs.</p>
Include files	
Number	Question 38
ID	LPIO16562
Full Name	Ian Emmas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> . There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. . Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. . As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure. . The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals

that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- . Such disparities within Dacorum must be taken into account when assessing development numbers and site options.

- . Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.

- . As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.

- . Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to

	focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO16697
Full Name	Katie Parsons
Company / Organisation	Historic England
Position	Historic Environment Planning Advisor
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We do not have a preference for any growth option at present until further information and analysis has been carried with regards to potential heritage impacts. However, we are keen to ensure that growth and development conserves and enhances the significance of the Borough's many heritage assets.</p> <p>We are pleased to see that the cumulative impacts deriving from the potential development at Gorhambury in the neighbouring authority of St Albans City and District is being considered as part of the growth options appraisal process. A good understanding of the cumulative impacts of development is an important part of understanding the wider impacts upon the historic environment.</p>
Include files	
Number	Question 38
ID	LPIO16728
Full Name	Lynsey Hillman-Gamble
Company / Organisation	Central Bedfordshire Council
Position	Strategic Plan Partnership Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Issue 28 – The sites identified to deliver potential growth are considered to be well distributed across the Borough. CBC would expect to be consulted upon any specific proposals taken forward at Markyate given the proximity of the settlement to Central Bedfordshire.
Include files	
Number	Question 38
ID	LPIO16845

Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO16913
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17001
Full Name	Chris Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17058
Full Name	Jade Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17115
Full Name	Grahame Senior
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I support and endorse the views expressed in the attached document as a member of GFRA

	<p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17250
Full Name	Debbie Crooks Pam Moss
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most</p>

suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest "Authority Monitoring Report & Progress on the Dacorum Development Programme" reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and

countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO17306
Full Name	Margaret and Andrew Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.

...

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
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- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development

	<p>should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO17362
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</p> <p>...</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17414
Full Name	Lesley Brown

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 38 below (copy of full response attached to question 46)</p> <p>Question 38</p> <p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.</p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <ol style="list-style-type: none"> 1 The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed. 1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified. <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p>
Include files	
Number	Question 38
ID	LPIO17469

Full Name	Sara Bell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17528
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>...</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17576
Full Name	MR DAVID BROWN
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Berkhamsted Citizens Association response to question 38 below (copy of full response attached to question 46)</p> <p>Question 38</p> <p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.</p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <ol style="list-style-type: none"> 1 The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed. 1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified. <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p>
Include files	
Number	Question 38
ID	LPIO17635
Full Name	Paul Hembury

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning & Development details my concerns comprehensively.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17709
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17758
Full Name	Diana Woodward
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express.</p> <p>BCA response to Question 38 below - full document attached to Question 46</p> <p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits</p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <ol style="list-style-type: none"> 1 The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed. 1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified. <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p>
Include files	
Number	Question 38
ID	LPIO17814
Full Name	John and Helen Osborne
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached). GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17872
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached). GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO17930
Full Name	Dave Davies
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established</p>
Include files	
Number	Question 38
ID	LPIO18039
Full Name	mr Richard Lambert
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMENT) , my own views can be summarised in a handful of bullet point.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO18110
Full Name	Mr Graham Bright
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows: GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO18167
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO18224
Full Name	Nicky and Dave Hulse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p>

	<p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO18278
Full Name	Gail Skelton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's</p>

infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development.

	<p>Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,</p> <ul style="list-style-type: none"> • Such disparities within Dacorum must be taken into account when assessing development numbers and site options • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO18337
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We are members of the Grove Fields Residents Association and as such support their recommendations.

	<p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LP1018505
Full Name	Melanie Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure. • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure.

Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.
- Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO18552
Full Name	Mrs Juliet Chodzko
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

I should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development

	<p>over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO18598
Full Name	Captain Andrew Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions

offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure

- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO18644
Full Name	Lindy Weinreb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.</p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <p>37. The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed</p> <p>38. Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p>
Include files	
Number	Question 38
ID	LPIO18691
Full Name	Hilary Abbott

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent</p>

budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be

	<p>recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO18737
Full Name	Paul and Gillian Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously, 5 year housing land supply needs to be located but the consultation document indicates that DBC has ill-conceived ideas of how to do this. The headline</p>

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

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold –

the only thing that has changed is that pressure on infrastructure has increased

- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
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- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building

	in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO18783
Full Name	Berkhamsted Citizens
Company / Organisation	Berkhamsted Citizens
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.</p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <p>37. The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed</p> <p>38. Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p>
Include files	

Number	Question 38
ID	LPIO18832
Full Name	Lyndsay Slater
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change</p>

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BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
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Include files	
Number	Question 38
ID	LPIO18879
Full Name	Andrew and Margit Dobbie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues & Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

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

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the

options offered to fit with favoured promoted land sites

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
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	State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO18925
Full Name	Katherine Cassels
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>...</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10

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Include files	
Number	Question 38
ID	LPIO19003
Full Name	Mrs Emma Robertson
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO19066
Full Name	Barbara Gainsley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</p> <p>Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.</p> <p>Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.</p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <p>Inspectors report July 2013</p>

	<p>1 The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed.</p> <p>1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified.</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p>
Include files	
Number	Question 38
ID	LPIO19123
Full Name	Bill Ahearn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I wish to register my objections to some of the proposals under consideration on the grounds they are simply too excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO19181
Full Name	Ms Sarah Hain
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO19239
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO19296
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Our family (4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town's infrastructure. We feel strongly that green belt land should be preserved for future generations</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO19312
Full Name	Richard House
Company / Organisation	Gladman Development Limited
Position	Policy Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Gladman has no particular preference in terms of the distribution of growth, however the scale of housing growth that the Council needs to accommodate means that development will need to be spread across the Borough. In its recent consultations and announcements, the Government has also made it clear that it is seeking to achieve a more diverse housing market that contains both large and small housebuilders. It is essential therefore that the Local Plan provides a mix of sites in terms of size and location that will deliver throughout the plan period.</p> <p>Undue reliance on large strategic sites will represent a major risk that the Local Plan will not deliver its housing requirement as such sites can be subject to significant delays in coming forward due to the planning process,</p>

	substantial infrastructure requirements and complexities caused by multiple land ownerships. This further emphasises the need for the Local Plan to provide for a wide range of sizes and locations of sites.
Include files	
Number	Question 38
ID	LPIO19350
Full Name	Stuart, Miranda & Melissa Kay
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q36 to 45. Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have <u>exceeded by a massive 34%</u>. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.</p> <p>Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.</p>

As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5** years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty

	<p>constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,</p> <ul style="list-style-type: none"> • Such disparities within Dacorum must be taken into account when assessing development numbers and site options • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO19400
Full Name	Wai Tang and Greg Barfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please note we are aware that the Berkhamsted Residents Action Group (BRAG) has responded in full to the “Issues & Options” consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.</p>

We wish to add our concerns to the DBC local plan issues and options consultation.

We are particularly concerned about the following

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

BRAG response to Question 38 (please note full document is attached to Q46)

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has

	<p>been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>
Include files	
Number	Question 38
ID	LPIO19446
Full Name	Philippa Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan.</p> <p>Question 38</p> <p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.</p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <p>Inspectors report July 2013</p> <p>1 The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed.</p>

	<p>1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified.</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p>
Include files	
Number	Question 38
ID	LPIO19501
Full Name	John Wignall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO19558
Full Name	Kevin Cullen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please refer to the attached report.(BRAG)</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered</p>

	by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established
Include files	
Number	Question 38
ID	LPIO19616
Full Name	Mark Lawson and Sharon Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO19672
Full Name	Vivienne Inmonger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 38, full document attached to question 46</p>

	We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established
Include files	
Number	Question 38
ID	LPIO19731
Full Name	John Inmonger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established</p>
Include files	
Number	Question 38
ID	LPIO19785
Full Name	Ben Barth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p>Question 38</p> <p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p>

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.

There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.

Inspectors report July 2013

1 The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed.

1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified.

Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.

Include files	
Number	Question 38
ID	LPIO19854
Full Name	Jon Esson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered</p>

	by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established
Include files	
Number	Question 38
ID	LPIO19938
Full Name	Chris Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA)</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established</p>
Include files	
Number	Question 38
ID	LPIO19995
Full Name	mrs sue van rhee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>

Include files	
Number	Question 38
ID	LPIO20052
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO20109
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>

Include files	
Number	Question 38
ID	LPIO20167
Full Name	Sherry and Haydn Bond
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO20224
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green</p>

	<p>belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO20272
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest "Authority Monitoring Report & Progress on the Dacorum Development Programme" reveals that in the first 5 years

(2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO20327
Full Name	David Clarke
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO20385
Full Name	Deborah Turnbull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability</p>

	to use these options or not has yet to be fully established.
Include files	
Number	Question 38
ID	LPIO20433
Full Name	Jane Collis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed

	<p>was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,</p> <ul style="list-style-type: none"> • Such disparities within Dacorum must be taken into account when assessing development numbers and site options • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO20495
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing in response to the Issues and Options consultation.</p> <p>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the</p>

	<p>response prepared by the planning consultant appointed by the GRFA.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO20542
Full Name	DR Brigitta Case
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the Berkhamsted Citizens’ Association and the Berkhamsted Residents Action Group. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has

been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Berkhamsted Citizens response

Has the Council considered all reasonable alternatives for distributing growth?

No

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.

There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.

- 1 The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed.
- 1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified. *Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development*

Include files	
Number	Question 38
ID	LPIO20589
Full Name	Christine Manning
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits</p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p> <ol style="list-style-type: none"> 1 The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed 1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p>
Include files	
Number	Question 38
ID	LPIO20611
Full Name	Ailsa Davis
Company / Organisation	HCC Development services, Property , Resources
Position	Principal Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	<p>As a landowner, HCC makes no comment on the most appropriate growth option or scale of development.</p> <p>From a landowner perspective HCC would simply make the following observation.</p> <p>Option 1A and 1B growth (900 houses at Berkhamsted and 300 houses at Tring/ no additional growth at either settlement respectively) would be likely to require the detached playing field at Dunsley Farm, already catered for in the adopted Core Strategy and Site Allocations documents.</p> <p>The numbers suggest that all other growth scenarios set out in the Issues and Options consultation will require additional secondary school capacity to serve Berkhamsted and Tring.</p> <p>(See table at question 8 above, taken from 10.4.2 of the Issues and Options consultation)</p>
Include files	
Number	Question 38
ID	LPIO20661
Full Name	Jane Hawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established</p>
Include files	
Number	Question 38
ID	LPIO20717
Full Name	Keiron Wybrow
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established</p>
Include files	
Number	Question 38
ID	LPIO20765
Full Name	Christopher Townsend
Company / Organisation	
Position	Councillor, Tring Town Council
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)</p> <p>In principle these have been covered, but the ability to use the alternatives as stated is, at best, not proven.</p>
Include files	
Number	Question 38
ID	LPIO20813
Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No , there must be other alternatives!
Include files	
Number	Question 38
ID	LPIO20859
Full Name	Mr Iain Manson

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

	<ul style="list-style-type: none"> • Such disparities within Dacorum must be taken into account when assessing development numbers and site options • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. •
Include files	
Number	Question 38
ID	LPIO20874
Full Name	Mrs. Sue Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues & Options Local Plan to 2036 and request that my comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these</p>

key matters. Please refer to the CCG submission for my full response.

Chiltern Conservation Group response below

1.iv. The LP identifies the 3 main towns of the Borough: Hemel Hempstead, Berkhamsted and Tring. Hemel Hempstead is the larger town with greater scope for supporting expansion and infrastructure. All 3 have good access to London and larger conurbations such as Watford and Milton Keynes by road and rail.

1.v. From a relatively small Old Town, housing at Hemel Hempstead has specifically been developed as 'spokes' of a wheel emanating from that centre, incorporating purpose-built main and local shopping centres, green spaces, schools for all ages, community facilities and churches. Provision of appropriate health care facilities remains a contentious issue. Major and significant investment has been expended upon the town, businesses and its retail centre, which can easily support and would indeed welcome increased footfall, employment opportunities and income generation.

1.vi. Berkhamsted and Tring, in particular, are smaller traditional 'ribbon' market towns with historical centres, where housing & associated infrastructure have grown organically. Education and healthcare present challenges to accommodate existing population. Both towns are surrounded by the Chilterns Area of Outstanding Natural Beauty (AONB) and significant swathes of Green Belt, which define and inform the characters of the towns and the AONB itself.

1.vii. The methodology used by DBC to calculate future housing needs is taken from the recent Dept. for Communities and Local Government Consultation paper '*Planning for the Right Homes in the Right Places*', 2017. As this Consultation only closed in November, no feedback or comments have yet been incorporated into this methodology and it is not, as yet, statutory. We find it premature therefore that such important calculations have been based on as yet unproven methodology, which as discussed with officers at one of the DBC Public Exhibitions, does not reflect the peculiar characteristics of different localities.

1.viii. As identified in pts 1.v & 1.vi, the Borough's three main towns are very different with hugely varying abilities to support and sustain large increases in population, as suggested in some options of the LP. This is not sufficiently taken into account in calculating population growth and housing needs.

Include files	
Number	Question 38
ID	LPIO20935
Full Name	Mr Jake Storey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I live in Berkhamsted and have witnessed the size of the small town growing in an unsustainable manner. As a result I joined SYBRA and also now BRAG. I have attached the BRAG response to your proposals</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments, • Such disparities within Dacorum must be taken into account when assessing development numbers and site options • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be

	<p>a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO20990
Full Name	Mr & Mrs J.D Battye
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents’ Action Group (BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG’s responses under our names so that a complete repetition of BRAG’s submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council’s submission.</p> <p>Q33 to Q38. BRAG. We fully support BRAG’s devastating analysis on what is the paramount issue before us.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p>

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the

town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this

- Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Berkhamsted Town Council response

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics, heritage legacies and infrastructure constraints which should be recognized when considering housing allocations between them. Housing distribution should not simply be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. The Planning Inspector stated in his report on the Core

Strategy [see Q9 for the reference] that development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting."

Any additional development over and above that already planned for in Berkhamsted would create significant issues given the town's infrastructure constraints and current deficits.

Moreover the Inspector said in Para 37 & 38:

"37. The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough's growth should be changed.

- 1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified.

Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.

	There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.
Include files	
Number	Question 38
ID	LPIO21075
Full Name	julie owen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	
Number	Question 38
ID	LPIO21140
Full Name	Sheron Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 38, full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	

Number	Question 38
ID	LPIO21169
Full Name	St Albans Diocesan Board of Finance
Company / Organisation	St Albans Diocesan Board of Finance
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1.32 Question 37 and 38: Growth Distributions Q.37 Yes / Q.38 No</p> <ul style="list-style-type: none"> • SADBDF supports the distribution noted under A – Focus on the three towns. It is inevitable that Hemel Hempstead will provide a focus for growth through the plan period; however, SADBDF strongly endorse the location of significant levels of growth at the other two towns within the District. Berkhamsted and Tring are sustainable locations for development, with good road and public transport access and a range of facilities and services within the town, including opportunities for employment • The Plan does little to champion the benefits which growth can bring to a settlement. Development can deliver significant enhancements to infrastructure, such as highway improvements, increased school capacity and health care facilities, among other benefits, such as open space provision • SADBDF strong supports the distribution of growth to the three towns, and supports the comment within the Plan, where the impact on Green Belt can be dispersed • SADBDF does not agree that Hemel Hempstead should receive a greater focus of growth. It is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place. However, the disbursement of growth provides a far more sustainable pattern of development
Include files	
Number	Question 38
ID	LPIO21216
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.
- Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the

	<p>town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this</p> <ul style="list-style-type: none"> • Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO21277
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I strongly support the Chiltern Countryside Group's submission regarding the Green Belt and AONB (below)</p> <p>1.iv. The LP identifies the 3 main towns of the Borough: Hemel Hempstead, Berkhamsted and Tring. Hemel Hempstead is the larger town with greater scope for supporting expansion and infrastructure. All 3 have good access to London and larger conurbations such as Watford and Milton Keynes by road and rail.</p> <p>1.v. From a relatively small Old Town, housing at Hemel Hempstead has specifically been developed as 'spokes' of a wheel emanating from that centre, incorporating purpose-built main and local shopping centres, green spaces, schools for all ages, community facilities and churches. Provision of appropriate health care facilities remains a contentious issue. Major and significant investment has been expended upon the town, businesses and its retail centre, which can easily support and would indeed welcome increased footfall, employment opportunities and income generation.</p> <p>1.vi. Berkhamsted and Tring, in particular, are smaller traditional 'ribbon' market towns with historical centres, where housing & associated infrastructure have grown organically. Education and healthcare present challenges to accommodate existing population. Both towns are surrounded by the Chilterns Area of Outstanding Natural Beauty (AONB) and significant swathes of Green Belt, which define and inform the characters of the towns and the AONB itself.</p>

	<p>1.vii. The methodology used by DBC to calculate future housing needs is taken from the recent Dept. for Communities and Local Government Consultation paper 'Planning for the Right Homes in the Right Places', 2017. As this Consultation only closed in November, no feedback or comments have yet been incorporated into this methodology and it is not, as yet, statutory. We find it premature therefore that such important calculations have been based on as yet unproven methodology, which as discussed with officers at one of the DBC Public Exhibitions, does not reflect the peculiar characteristics of different localities.</p> <p>1.viii. As identified in pts 1.v & 1.vi, the Borough's three main towns are very different with hugely varying abilities to support and sustain large increases in population, as suggested in some options of the LP. This is not sufficiently taken into account in calculating population growth and housing needs.</p>
Include files	
Number	Question 38
ID	LPIO21339
Full Name	Antony Harbidge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased

- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted

	and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO21385
Full Name	Helen Kington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest "Authority Monitoring Report & Progress on the Dacorum Development Programme" reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy

targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,

- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO21428
Full Name	Mr R Smith and Mr A Lyell
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1.32.1 The Landowners support the distribution noted under A – Focus on the three towns; it is inevitable that Hemel Hempstead will provide a focus for growth through the plan period; however, The Landowners strongly endorse the location of significant levels of growth at the other two towns within the District and the larger villages.</p> <p>1.32.2 The Plan does little to champion the benefits growth can bring to a settlement; development can deliver significant enhancements to infrastructure, such as highway improvements, increased school capacity and health care facilities, among other benefits, such as open space provision</p> <p>1.32.3 The Landowners strongly support proportionate distribution of growth to the three towns and other settlements, and support the comment within The Plan, that the impact on Green Belt should be dispersed rather than focussing development of Greenfield sites on a few very large allocations.</p> <p>1.32.4 The Landowners do not agree that Hemel Hempstead should receive a greater focus of growth; it is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place; however, the dispersal of growth provides a far more sustainable pattern of development.</p>
Include files	
Number	Question 38
ID	LPIO21502
Full Name	Hightown Housing Association
Company / Organisation	Hightown Housing Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Question 38 Has the Council considered all reasonable alternatives for distributing growth? Yes
Include files	
Number	Question 38
ID	LPIO21565
Full Name	Mrs Valerie Silverton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have read the proposals and strongly agree BRAG's responses.</p> <p>BRAG response to Question 38 (please note full document is attached to Q46)</p> <p>Question 38 <i>Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p>No</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure • The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest "Authority Monitoring Report & Progress on the Dacorum Development Programme" reveals that in the first 5 years (2006-11) of the plan Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by a massive 34%. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some 21% below the target figure. So, all the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments, • Such disparities within Dacorum must be taken into account when assessing development numbers and site options • Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development

	<p>over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits</p> <ul style="list-style-type: none"> • As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this • Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO21622
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum’s New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p>GFRA Response to Question 38 , full document attached to question 46</p> <p>We consider that the principle of the available options for growth distribution have been satisfactorily covered by the Local Authority however it is reiterated that at this point in time the conclusions raised as to the availability to use these options or not has yet to be fully established.</p>
Include files	

Number	Question 38
ID	LPIO21638
Full Name	Jorn Peters
Company / Organisation	Greater London Authority
Position	Senior Strategic Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The consideration of longer term historic migration trends in the South West Hertfordshire Strategic Housing Market Assessment is welcomed. The Council should note that our latest population and household projections are now also available on the London Datastore:</p> <p>https://data.london.gov.uk/dataset/2016-based-projections-national-outputs</p> <p>These projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft London Plan, which we are consulting on until 2 March 2018.</p> <p>The Council has assessed different levels and distributions of growth, and we would welcome the further consideration of options designed to meet the identified housing need. We would also encourage cooperation with St Albans Council to resolve cross-boundary matters on growth figures.</p>
Include files	
Number	Question 38
ID	LPIO21649
Full Name	Silversaw Ltd
Company / Organisation	Silversaw Ltd
Position	
Agent Name	Mark Novelle
Company / Organisation	CBRE
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Silversaw are in support of Growth Option C which advocates the distribution of growth across all three towns, with all three of the larger villages also sharing responsibility for accommodating future growth needs within DBC. This would disperse the impact upon the Green Belt but would provide an opportunity to target local housing needs and deliver housing where people need housing.</p>
Include files	
Number	Question 38
ID	LPIO21695

Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • CPUK supports the distribution noted under A – Focus on the three towns; it is inevitable that Hemel Hempstead will provide a focus for growth through the plan period; however, CPUK strongly endorse the location of significant levels of growth at the other two towns within the District. Berkhamsted and Tring are sustainable locations for development, with good road and public transport access and a range of facilities and services within the town, including opportunities for employment. • The Plan does little to champion the benefits growth can bring to a settlement; development can deliver significant enhancements to infrastructure, such as highway improvements, increased school capacity and health care facilities, among other benefits, such as open space provision. • CPUK strong supports the distribution of growth to the three towns, and support the comment within The Plan, where the impact on Green Belt can be dispersed. • CPUK does not agree that Hemel Hempstead should receive a greater focus of growth; it is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place; however, the disbursement of growth provides a far more sustainable pattern of development.
Include files	
Number	Question 38
ID	LPIO21722
Full Name	Roger Saller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. Having lived in Berkhamsted since the beginning of this century, I feel that I have a

unique perspective on what made the town attractive and what is now at risk.

Sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them.

Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes. Of the options put forward, **Option 1B** is the only one that would be acceptable for Berkhamsted.

BRAG response

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has

	<p>been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.</p>
Include files	
Number	Question 38
ID	LPIO21736
Full Name	Mr John Mawer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The either / or approach to locations serves only to pit one community against the other. This may make life easier for planners but fails to see the perspective of residents. It effectively asks the question 'Would you wish to see development in your area or not?' What possible outcomes could there be to this? Clearly a charter for the vociferous.</p> <p>A more dispersed approach is vital. There is already a social divide between Hemel Hempstead and the smaller towns. A focus of development on Hemel will increase this. A rough calculation based on 6.2.8 would suggest the potential 10% increase in Hemel Hempstead 3% Berkhamsted 4% Tring. While I applaud the formal protection afforded some areas, there needs to be careful consideration of the potential for concentrating less desirable developments into the remaining areas. This is very true of a borough which includes large areas of AONB.</p> <p>The division between the areas is amply demonstrated by the fiasco over traveller sites driving the phasing of the entire core strategy. As a DBC councillor stated, the proposed traveller site in Tring would 'not create a good impression'.</p>
Include files	
Number	Question 38
ID	LPIO21801
Full Name	Capital and Regional plc.
Company / Organisation	Capital & Regional Plc
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> The IOD sets out three options for accommodating growth in the borough – a focus on three towns, a greater focus on Hemel Hempstead, or more evenly spread across the borough <p>It is C&R's view that HHTC can accommodate significant growth for new homes and jobs. Further information regarding infrastructure requirements and the capacity of the town centre for accommodating growth can be discussed as the capacity and scope develops.</p>
Include files	
Number	Question 38
ID	LPIO21834
Full Name	W Lamb Ltd
Company / Organisation	W Lamb Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	yes
Include files	
Number	Question 38
ID	LPIO21905
Full Name	Louis Quail
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the augment for building on greenbelt land should only be one of last resort , there are plenty of other options left before launching off this one way route .</p> <p>Berkhamsted Residents Action Group response:</p> <ul style="list-style-type: none"> There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the

options offered to fit with favoured promoted land sites.

- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of

	State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.
Include files	
Number	Question 38
ID	LPIO21974
Full Name	Thomas and Margaret Ritchie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I have not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council's response:</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics, heritage legacies and infrastructure constraints which should be recognized when considering housing allocations between them. Housing distribution should not simply be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. The Planning Inspector stated in his report on the Core Strategy [see Q9 for the reference] that development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting.”</p> <p>Any additional development over and above that already planned for in Berkhamsted would create significant issues given the town’s infrastructure constraints and current deficits.</p> <p>Moreover the Inspector said in Para 37 & 38:</p> <p>“37. The Council's approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough’s growth should be changed.</p> <p>38. Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at</p>

	<p>Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council's approach of focussing growth on Hemel Hempstead is justified. "</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p>
Include files	
Number	Question 38
ID	LPIO22015
Full Name	Millbank Land
Company / Organisation	Millbank Land
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>In line with the views set out in response to Question 8 above, Option A – Focus on three towns. Tring is well placed to sustainably accommodate a proportion of Dacorum's housing growth over the course of the Local Plan period to 2036. Focusing growth within the three town would allow for a better match between housing and local infrastructure provision and would alleviate some of the pressure on Hemel Hempstead.</p> <p>Careful site selection could ensure that the impact on the Green Belt is minimised.</p>
Include files	
Number	Question 38
ID	LPIO22051
Full Name	Gallagher Estates
Company / Organisation	Gallagher Estates
Position	
Agent Name	Mrs Hanna Staton
Company / Organisation	Pegasus Group
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes. Although, as set out in further detail below, given the need to deliver a significant increase in dwelling provision there will be a need to implement a combination of the options presented.
Include files	

Number	Question 38
ID	LPIO22086
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As previously highlighted, further work needs to be done to identify suitable brownfield opportunities to accommodate required development needs alongside further cross-boundary discussions through the Duty to Cooperate.</p> <p><u>QUESTION 38 Alternatives for the Distribution of Growth - Summary Representation and Response Sought:</u></p> <p>Further work is required to ensure that the development yield from urban sites, previously developed land and imposition of appropriate higher densities is maximised. Sites identified through preparation of a Brownfield Register (required to be in place by Christmas 2017) will also contribute to a reduction in the need to take greenfield / Green Belt land.</p> <p>Further discussions under the Duty to Cooperate should be held with both Three Rivers and St Albans District Councils in the allocation and delivery of development on the boundary between these authorities.</p>
Include files	
Number	Question 38
ID	LPIO22107
Full Name	Crest Nicholson
Company / Organisation	
Position	
Agent Name	Sarah Moorhouse
Company / Organisation	Lichfields
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please see the Land at Blegberry Gardens, Berkhamsted (Site Be-h6) - Representations to Dacorum's New Local Plan: Issues and Options (Nov 2017) document by Lichfields on behalf of Crest Nicholson Chiltern.
Include files	Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Reps (13.12.17).PDF
Number	Question 38
ID	LPIO22152
Full Name	Mrs Hayley Gillard

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO22195
Full Name	Mr Peter Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO22240
Full Name	Miss Sophie Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 38
ID	LPIO22255
Full Name	Bruce Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED]

	<p>██████ (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22259
Full Name	Mr & Mrs Hutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison ████████</p> <p>██████ (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22263
Full Name	Mr & Mrs Gray
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison ████████</p> <p>██████ (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22267
Full Name	Mr & Mrs Shaw

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22271
Full Name	Mr & Mrs Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22275
Full Name	Hassan & Caroline Farran & Jarrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p>

	If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.
Include files	
Number	Question 38
ID	LPIO22279
Full Name	Mr & Mrs de Lisle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22283
Full Name	Adam & Ruth Trigg & Barrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22287
Full Name	Mr & Mrs Henderson
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22291
Full Name	Mr & Mrs McGregor
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22295
Full Name	Mr& Mrs Adams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the</p>

	ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.
Include files	
Number	Question 38
ID	LPIO22299
Full Name	Mr & Mrs Butcher
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22303
Full Name	Emma & Elizabeth Pemberton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22307
Full Name	Mr & Mrs Ostle
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Neil Aitchison and Philip Jones:</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22311
Full Name	Mr & Mrs Wotherspoon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22315
Full Name	Mr & Mrs Champion
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	

Number	Question 38
ID	LPIO22319
Full Name	Mr & Mrs Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22323
Full Name	Mr & Mrs Eustace
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22327
Full Name	Mr & Mrs Rasiah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>In this regard I support the succinct statements made by Mr.Neil Aitchison representing residents of Ivy house Lane, Mr.Phillip Jones representing the Hunters Park residents and Mr.Bruce Morris representing primarily the residents of Brackenhill and would urge Council to consider their weighted evidence.</p> <p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22394
Full Name	Mr Neil Aitchison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22398
Full Name	Mr & Mrs Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES ANO OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>

Include files	
Number	Question 38
ID	LPIO22402
Full Name	Mr & Mrs Sewell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES ANO OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22406
Full Name	Mr & Mrs J Forrester
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES ANO OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	

Number	Question 38
ID	LPIO22410
Full Name	Man & Mrs Forster
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES ANO OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22414
Full Name	Mr & Mrs J Riddle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES ANO OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22418

Full Name	Mr & Mrs M Avern
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>If the Government require more housing to be provided this should be located in Hemel Hempstead with the ability to find local employment at Maylands thus limiting out commuting from Berkhamsted.</p>
Include files	
Number	Question 38
ID	LPIO22519
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below)</p> <ul style="list-style-type: none"> • There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. • Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased. • As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.

- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5 years** (2006-11) of the plan Berkhamsted **delivered 10 yearsworth** of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure.
Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

Include files	
Number	Question 38
ID	LPIO22569

Full Name	Mrs C Longbottom
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>I support all answers and comments to the Issues & Options Consultation document noted on the Berkhamsted Town Council website</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics, heritage legacies and infrastructure constraints which should be recognized when considering housing allocations between them. Housing distribution should not simply be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. The Planning Inspector stated in his report on the Core</p> <p>Strategy [see Q9 for the reference] that development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting.”</p> <p>Any additional development over and above that already planned for in Berkhamsted would create significant issues given the town’s infrastructure constraints and current deficits.</p> <p>Moreover the Inspector said in Para 37 & 38:</p> <p>“37. The Council’s approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough’s growth should be changed.</p> <p>1 Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council’s approach of focussing growth on Hemel Hempstead is justified.</p> <p>“</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p>
Include files	
Number	Question 38

ID	LPIO22639
Full Name	Mr & Mrs Mehew
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We write as residents of [REDACTED] [REDACTED]</p> <p>in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) (see comments LPIO18384, 18385) and the draft response prepared by Berkhamsted Town Council.</p> <p>Berkhamsted Town Council Response:</p> <p>Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics, heritage legacies and infrastructure constraints which should be recognized when considering housing allocations between them. Housing distribution should not simply be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. The Planning Inspector stated in his report on the Core Strategy [see Q9 for the reference] that development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting.”</p> <p>Any additional development over and above that already planned for in Berkhamsted would create significant issues given the town’s infrastructure constraints and current deficits.</p> <p>Moreover the Inspector said in Para 37 & 38:</p> <p>" 37. The Council’s approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough’s growth should be changed.</p> <p>38. Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the</p>

	<p>Council's approach of focussing growth on Hemel Hempstead is justified."</p> <p><i>Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.</i></p> <p>There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.</p>
Include files	
Number	Question 38
ID	LPIO22716
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Question 38 – Has the Council considered all reasonable alternatives for distributing growth?</i></p> <p><u><i>Preferred Options for Delivering Growth</i></u></p> <p>Seven growth options have been put forward, summarised at paragraph 10.4.2.</p> <p>We have no comment at this stage on which option/s are preferable from a transport and highways perspective. We will work with DBC as the Local Plan develops towards a preferred option, with learning from transport modelling which is underway and transport assessment work on the potential sites. It is recognised that the site appraisals are early stage, and more work will be needed to understand which of the green field sites would perform better in planning and transport terms.</p> <p>It is important that new development is located in areas which are already accessible by sustainable modes of transport or can be made so. If development is more concentrated on Hemel Hempstead or the three main towns, then it is likely that residents of new development are less likely to need to travel as far to access services and facilities – although improvements may be needed to reflect population growth. Some growth in the smaller settlements may be beneficial in order that they retain the services they have – bus services to the more rural areas in the Borough can struggle for commercial viability and extra patronage would be beneficial.</p>
Include files	
Number	Question 38
ID	LPIO22825
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Further cross boundary discussion needs to take place with St Albans and Three Rivers as part of Kings Langley lays in Three Rivers borough
Include files	